



promoting equality in housing  
hybu cydraddoldeb ym maes tai



## Tai Pawb

## Cymorth Cymru

**Consultation response:**

Mandatory quality standards for new homes

**Welsh Government**

October 2020

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## About Tai Pawb

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's purpose is, "To Inspire Wales to be a Fairer Place to Live" with a mission to promote equality and social justice in housing in Wales. It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

## What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector.

For further information visit: [www.taipawb.org](http://www.taipawb.org)

Charity registration no. 1110078

Company No. 5282554

## About Cymorth Cymru

Cymorth Cymru is the representative body for providers of homelessness, housing and support services in Wales. Our members provide a wide range of services that support people to overcome tough times, rebuild their confidence and live independently in their own homes. This includes people experiencing or at risk of homelessness, young people and care leavers, older people, people fleeing violence against women, domestic abuse or sexual violence, people living with a learning disability, people experiencing mental health problems, people with substance misuse issues and many more.

We act as the voice of the sector, influencing the development and implementation of policy, legislation and practice that affects our members and the people they support. We are committed to working with people who use services, our members and partners to effect change. We believe that together, we can have a greater impact on people's lives. We want to be part of a social movement that ends homelessness and creates a Wales where everyone can live safely and independently in their own homes and thrive in their communities.

Website: [www.cymorthcymru.org.uk](http://www.cymorthcymru.org.uk)

**1. What are your general views on the proposed new policy with regard to the issues itemised within the above Summary:**

We recognise the need for simpler standards to enable greater flexibility and innovation in design. We welcome the inclusion of Lifetime Homes standard as part of the requirements (see below). We would strongly suggest that, where homes are built for wheelchair users, an additional requirement is added which would either provide a definition of a wheelchair accessible standard or refer to a best practice standard (see below).

We welcome the proposal for the new standards to apply to section 106 agreements in order to reduce inconsistency of application, as well the Review of Affordable Housing Supply recommendation for a longer term goal of applying the standards regardless of tenure by 2025. As part of the drive to increase affordable housing, of which there is acute shortage<sup>1</sup>, we would welcome the inclusion of Modern Methods of Construction to help deliver this need. This should enable homes to be built at a faster pace to meet housing needs and alleviate homelessness, as well as contributing to the decarbonisation agenda through more energy efficient building methods and reducing fuel poverty, which in turn helps to prevent homelessness. However, it will be important to provide assurances about the quality and resilience of new and emerging methods and materials, particularly in the construction of housing targeted at people on lower incomes.

We note that no information is provided on how the standards are going to operate in Wales, in terms of approvals, monitoring and enforcement – we would suggest, that for the sake of transparency, the new policy provides this information. We would suggest that this should include a clear process, which can be understood by local communities and groups which might have interest in the quality and design of homes built within their local environments.

**2. What are your general views on the proposed new policy with regard to the “evidence for change” itemised within the above Summary:**

We agree with the consultation document, which states that house sizes are becoming too small, challenging compliance with inclusive design principles such as Lifetime Homes and other mobility considerations which are not sufficiently legislated for under the Approved Documents to building regulations. The issue of size has become particularly important during the recent pandemic, with children and adults learning and working from home, and it is important that families on lower incomes do not face increased inequalities as working from home becomes the norm.

We agree that it is widely accepted that the confusion in relation to section 106 agreements presents challenges. We have heard of examples where developers objected to building affordable homes under this provision to the DQR standard and, in consequence lower

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<sup>1</sup> <https://senedd.wales/NAfW%20Documents/ki-021.pdf%20-%2003112011/ki-021-English.pdf>

standards were accepted by local authorities. This is likely to be a problem in many parts of Wales. Therefore, a requirement to apply the proposed policy to Section 106 agreements is a crucial step in achieving consistently high standards across all social and affordable housing.

### **3. Do you think there are any benefits to the proposed new policy:**

In our opinion, one of the key benefits is the inclusion of Lifetime Homes standard.

Tai Pawb was represented at the previous ministerial DQR review working group (2015) and submitted evidence in the course of the work of the group, mainly in relation to accessibility and flexibility features of DQR, specifically in relation to Lifetime Homes features. The review took over a year, considered a range of evidence and concluded with a report. In 2016 Welsh Government issued consultation on the proposed introduction of two sets of mandatory standards. Standard a) for existing homes which was equivalent to WHQS and standard b) for new and rehabilitated homes, which was the DQR standard including amendments agreed as part of the 2015 review.

We would specifically like to focus our attention on the Lifetime Homes Standard (LTH) which has been incorporated into DQR in 2001 and which has therefore been operating in Wales for 17 years. We will draw on evidence submitted in 2015 as well as evidence provided to the Affordable Housing Supply Review and any new evidence related to Lifetime Homes standard.

#### **We support the inclusion of Lifetime Homes standard as a requirement in the new policy.**

The Lifetime Homes standard seeks to enable ‘general needs’ housing to provide a design solution that meet the existing and changing needs of diverse households. A tenant can remain in the same home for their whole life as consideration of their whole life needs are incorporated in the design of the house. In turn, each house offers more flexible housing solution as the adaptability inherent in its design enables the house to meet the needs of a variety of tenants.

Housing that is designed to the Lifetime Homes Standard will be convenient for most occupants, including some (but not all) wheelchair users and disabled visitors, without the necessity for substantial alterations.

Although Lifetime Homes may offer convenience for a variety of tenants in their everyday activities – navigating a pushchair, carrying bulky items, the intention is that they improve the living conditions and independence of those with mobility issues with some simple adaptations or that the standards lay the foundations for future.

Welsh Government Framework for Action on Independent Living lists ‘Improved access to adapted and accessible housing’ as a specific outcome and describes the impact that accessible and adapted housing has on the wellbeing of disabled people in Wales.

### Why do we need Lifetime Homes

There is strong evidence of the chronic shortage of accessible housing in Wales as documented by EHRC's recent housing inquiry<sup>2</sup> as well as Welsh Government's own population projections pointing at substantial growth in older population, disability and growing accessibility needs of future generations.

Twenty-six per cent of the population of Wales is disabled (ONS Family Resources Survey 2015/16) and this figure is projected to rise significantly in the future. **Welsh Government population projections show that the number of people over 65 with mobility problems will increase by 58 per cent by 2035 (Wales Audit Office, 2018).** Over 250,000 adults in Wales have a mobility impairment, which is more than 10 percent of all adults in Wales (Leonard Cheshire, 2014). Whilst 24% of Welsh population is classed as disabled (Census 2011), this increases to 39% amongst social housing tenants. The Annual Population Survey (2004-2010) found that the occurrence of disability generally increased with age. Over a third (38.3 per cent) of people between 55 and pensionable age were found to be disabled.<sup>3</sup>

Between 2004 and 2010 the number of social housing tenants in the 45 to 59 age band increased by 17 per cent (whereas in the Welsh population as a whole there was only a slight increase of 2 per cent in those aged 45-59)<sup>4</sup>. This again signifies that even medium-term age-related pressures on social housing are likely to be significant.

With an ageing population and the number of disabled people increasing, the demand for accessible and adaptable homes is going to significantly increase in the coming years. Unless action is taken to address this now, disabled people will increasingly be subjected to living in homes, places or contexts that deny them their right to independent living.

For this reason, we would strongly advocate that LTH are an essential part of any future housing standards. Moreover, we would suggest that Lifetime Homes (or a similar standard e.g. equivalent to English Part M (4) Cat 2 standard) is incorporated into Welsh planning policy/building regulations and, in the future, applies to homes of all tenures.

This was being considered as far back as 2007, e.g. in 2007 the then Deputy Minister for Housing stated: *We are however committed to the principles of barrier free housing and the introduction of Lifetime Homes Standards across all tenures.* Followed by the then Minister for Environment, Sustainability and Housing: *Devolution of the Building Regulation function to Wales will provide the opportunity for us to consider introducing Lifetime Homes Standards to all new homes in Wales irrespective of tenure.*<sup>5</sup>

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<sup>2</sup> <https://www.equalityhumanrights.com/en/publication-download/housing-and-disabled-people-wales-hidden-crisis>

<sup>3</sup> Stats Wales Bulletin (SB 45/2012) Equalities Data for Social Housing Tenants. 29 May 2012

<sup>4</sup> ibid

<sup>5</sup> <http://www.assembly.wales/en/bus-home/pages/plenaryitem.aspx?category=Written%20Question&itemid=279>

While in England accessibility has been built into building regulations in a much more detailed way, Wales has not followed. In England, approved Document M (commonly referred to as “Part M”) now has 2 volumes. Volume 1 relates to Dwellings. Volume 2 relates to buildings other than dwellings. The new volume 1 which deals with domestic properties now has 65 pages. (The previous version allocated 8 pages to “domestic properties”).

The English Part M, Volume 1 has been split into 3 sections. These are

- Category 1: Visitable dwellings
- Category 2: Accessible and adaptable dwellings
- Category 3: Wheelchair user dwellings

Category 2 now replaces Lifetime Homes (but only in England).

Current Welsh “Approved Document M: Access to and use of buildings (For use in Wales): 2004 edition incorporating 2010 amendments” issued by Welsh Government in 2017 is effectively a repeat of that used in England and Wales prior to Wales being given responsibilities for Planning.

As such, it fails to address adequately the needs of an ageing and increasingly disabled society. It fails because it attempts to address the needs of everyone within its 7 pages. There is mention, for instance, of “the needs of a wheelchair user, or a stick or crutch user”. However, this is lost amongst a host of other general requirements.

Another advantage of separate sections dealing with specific needs (as in the new English “Part M”) is that if a quota system for accessible and adaptable housing was introduced, then a direct requirement can be made relating to a specific section of an Approved Document rather than a general reference. This is where the new English Approved Document M is so much clearer. (Disability Advice Project, 2018)

Moreover, UK Government has recently consulted<sup>6</sup> on raising accessibility standards of all new homes, irrespective of tenure. There is a strong argument for a similar review in Wales.

We would advocate that Welsh Government aims towards a policy **where all new homes in Wales, irrespective of tenure, are Lifetime Homes compatible, with 10% of all homes built to wheelchair accessibility standard**, also incorporated into planning policy (e.g. see London Plan which requires 90% of new homes in London to be M(4) Cat 2 compatible and 10% of all new homes to be built to Wheelchair Accessibility standard.

We have previously heard arguments from stakeholders that Lifetime Homes should not apply to smaller properties as they are more likely to be occupied by younger people, who suffer affordability disadvantage in the current market. There are two important factors to consider here: firstly, our experience shows us that younger disabled people experience serious disadvantage in terms of availability of housing and services for them (as these tend to be

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<sup>6</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/917626/200813\\_con\\_doc\\_-\\_final.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/917626/200813_con_doc_-_final.pdf)

geared towards older people); secondly, we need to consider the effects of welfare reform and austerity on older people, who might be downsizing to reflect benefit entitlements (we have not identified any research on this topic, but it would be important to investigate this potential effect). Thirdly, as some people become disabled in older age, a number of them will apply for transfer to smaller accessible properties, rather than having adaptations fitted in their current properties (in fact we know that some social landlords operate a policy of refusing larger adaptations in under occupied housing).

### Cost of Lifetime Homes

The cost of Lifetime Homes is difficult to quantify as it will depend on estimated cost of design, materials and work needed. These can vary depending on a number of factors considered below.

The Lifetime Homes website, for example, estimates the additional costs of building a Lifetime Home to be between £545 to £1,615 per dwelling, although this will depend on variables such as the experience of the home designer and builder and the size of the dwelling (easier to design larger lifetime home dwellings cost effectively)<sup>7</sup>. It could certainly be argued that, as Lifetime Homes have been built since 2001 in Wales<sup>8</sup> the level of process costs could be lower than in England, as professions have experience of the design and building of these homes – this could reduce the costs considerably.

Paper commissioned to look into the Health Benefits of Lifetime homes<sup>9</sup> by DCLG refers to the work of previous reports (including a Report commissioned by the National Assembly for Wales in 1999) and provides an estimate of £90 to £1,615.

The Joseph Rowntree Foundation (JRF) undertook a cost benefit analysis in 1997 and concluded that building Lifetime Homes *was* cost effective and that the cost of building the home would be offset by savings made across the life of that home by £250<sup>10</sup>.

As many of the calculations mentioned above were undertaken some time ago, a more recent and Wales specific estimate should be generated.

Lifetime Homes standard helps save public money spent on adaptations each year. Evidence from Welsh Government in the course of the previous DQR review, considered the following: there were 105 installations of level access showers in Cardiff's housing funded from Disabled Facility Grant stock in 11/12 the average costs of which was £6,819. There were also 14 ground floor shower extensions built to install level access showers in 12/13 with an average cost of £38,946<sup>11</sup>. The Rapid Repair Action Programme provides urgent adaptations, and in

<sup>7</sup> <http://www.lifetimehomes.org.uk/pages/costs.html>

<sup>8</sup> There are approximately 7,000 Lifetime Homes in Wales (stats Wales)

<sup>9</sup> Roys M (BRE Ltd). Assessing the Health Benefits of Lifetime Homes. 2012.

<sup>10</sup> <http://www.jrf.org.uk/media-centre/lifetime-homes-match-higher-building-standards-with-long-term-cost-effectiveness>

October 2013

<sup>11</sup> Figures drawn from Physical Adaptation Grants data (September 2013)

2010-11 undertook 13,777 adaptation activities. Many of these adaptations consist of adding ramps to remove steps, adding hand rails, installing ground floor showers and adapting spaces to enable ground floor sleeping<sup>12</sup>. Adaptations which are inherent or made easier and more cost effective by the Lifetime Homes design.

One of the housing associations which took part in the 2015 DQR review, submitted the following analysis of their own PAG spending:

Year	Average Cost of pre-Lifetime Homes PAGS	Average Cost of Lifetime Homes PAGS
2007/2008	£5,600.87 (99)	£706.20 (3)
Total Cost	£554,486.13	£2,118.60
2008/2009	£5,021.08 (87)	£2,717.37 (2)
Total Cost	£436,833.96	£5,434.74
2009/2010	£4,280.59 (112)	£119.19 (3)
Total Cost	£479,426.08	£357.57
2010/2011	£5,965.16 ( 96)	£2,712.97 (10)
Total Cost	£572,655.36	£27,129.70
2011/2012	£8,339.82 (20)	£0.00 (0)
Total Cost	£166,796.40	£0.00
2012/2013	£5,779.29 (52)	£107.93 (5)
Total Cost	£300,523.08	£539.65
2013/2014	£2,246.49 (49)	£1,084.33 (5)
Total Cost	£110,078.01	£5,421.65
<b>Overall Average Cost of PAGS</b>	<b>£5,319.04 (515)</b>	<b>£1,064.00 (28)</b>
<b>Total Overall Cost</b>	<b>£2,620,799.02</b>	<b>£41,001.91</b>

The above analysis shows that during this period, the cost of adapting homes designed to Lifetime Homes was on average **£4,255.04** less than for properties that are not Lifetime Homes. Further analysis of similar data in other housing associations could help determine to what extent the overall cost of adaptations in non-lifetime homes properties could have been reduced if the tenants lived in a lifetime home property (i.e. the need for some adaptations would have been non-existent).

<sup>12</sup> Figures collected in-house



Despite the variation in estimates of building a Lifetime Home it is clear that there are substantial costs involved in retrofitting. Demand for adaptations is likely to increase as the population ages (see the section below) and so the cost of retrofitting is likely to grow. The Rapid Repair Action Programme for example, costs £2.1m and the demand for this programme is only likely to increase given the population projections and current knowledge of the make-up of social housing populations.

### Site Density

One of the arguments referring to the cost of LTH relates to the reduced site density as a result of the increased space standards (e.g. space for downstairs shower).

It is generally accepted that LTH have impact on the required footprint for each unit and site density, thus reducing profit for the builder/developer. However, a report looking into the impact of Lifetime Homes on site density suggested that use of alternative layouts could reduce, or even eliminate the impact on space. It also concluded that building to Lifetime Homes standards is just one of many factors, such as planning restrictions or the developers own choices around frontage and parking etc., that can reduce actual site density below the theoretical maximum<sup>13</sup>.

It could also be argued that, if LTH became a standard for all homes built in Wales, the industry and, arguably, land prices and profit margins, would adjust to this change. For example, a private developer told the 2018 EHRC inquiry that they thought that increased building costs associated with building to English Part M4(2) (largely comparable to LTH) would be negligible in the longer term if it became the industry standard.

### LTH impact on tenants

The Joseph Rowntree Foundation (JRF) commissioned a study of Lifetime Homes, specifically from the inhabitants view<sup>14</sup>. They specifically focused on populations which might be benefitting from LTH features. Thirty-five percent of the sample were over the age of 55, while a third of those taking part reporting having mobility issues which may have affected the way that they 'use or move around their home'.<sup>15</sup> The majority of people, for example, were aware that they had wider doorways (95%), or that they had a downstairs toilet with space for a shower to be installed (88%). But interestingly awareness of many adaptations increased with age. While only 45% of those aged under-35 were aware that they had extra strong walls in bathrooms and toilets to fix grab rails, 88% of those aged over 55 were aware of this. Similarly, 57% of those aged under 55 were aware that they had enough space downstairs for a bed, but this awareness rose to 85% amongst those aged over 55.

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<sup>13</sup> Impact on Site Density of Lifetime Homes. Levitt, Bernstein. July 2012

<sup>14</sup> Sopp and Wood. (2001) Living in a Lifetime Home: A survey of residents' and developers' views. Joseph Rowntree Foundation. York

<sup>15</sup> ibid

The study also asked about the importance of some of the features of LTH which clearly increases with age:

Adaptation	Proportion of those aged under 55 reporting it as 'very important'	Proportion of those aged over 55 reporting it as 'very important'
Downstairs Toilet	63%	81%
Low level, easy to access windows	55%	92%
Convenience of sockets, switches and control heights	23%	84%
Possibility of installing a lift from ground to first floor	17%	70%

The English Department of Communities and Local Government commissioned a study to assess the health benefits of the Lifetime Homes standards. The study used existing data sources (the English House Conditions survey and the Housing Health and Rating Scheme) to provide an estimated costs saving on Lifetime Homes. It concluded that building to Lifetime Homes standards could provide a saving of £194 over 60 years (in comparison to new builds) and that this would increase to £700 if the potential adaptations inherent in the design of Lifetime Homes (hand rail in bathroom, etc) were made. The research also looked at the indirect costs (the costs to society) and concluded that here, Lifetime Homes could save £1,600 (or £8,600 if potential adaptations were made). Together this would mean an estimated direct saving of around £1,794 and an indirect saving of £9,300<sup>16</sup>.

When considering Lifetime Homes as part of Mandatory Quality Standards, it would also be important to consider the potential mental health and wellbeing effects of e.g. having more space, being able to return home from hospital, being more independent, reduced time and cost of adaptations etc. We are not aware of any study which considered the above.

#### 4. Do you think there are any dis-benefits to the proposed new policy?

Please see below.

#### 5. What changes (if any) do you think are needed to the proposed new policy? Please explain and provide evidence for your views:

##### Wheelchair accessible homes:

While the policy makes reference to wheelchair accessibility, we would strongly suggest that the policy sets out wheelchair accessibility standard for those homes, which are built for

<sup>16</sup> Roys, M Assessing the health benefits of Lifetime Homes. Building Research Establishment Ltd. July 2012

wheelchair users. Whilst we understand that some wheelchair accessible homes are built with specific tenants in mind and may need tailored design, this is not always the case. We stressed above that it is important to set local or regional needs-based targets for building wheelchair accessible housing and, by following best practice such housing can be built to provide wheelchair users with improved choice as well as reduce waiting times whilst on the housing list. There is currently no definition of a wheelchair accessible standard provided by Welsh Government (as opposed to English building regulation). Setting a minimum standard would no doubt increase awareness of inclusive design and drive improvements and best practice in Wales. We would advise that this standard is based on Habinteg’s Wheelchair Housing Design Guide<sup>17</sup>. As a minimum, the proposed policy should include reference to this guide with key features.

*“Bathroom designed so it is capable of adaptation for use by a person in a wheelchair”.*

We would suggest that a stronger description of ‘capable of adaptation’ is provided in the proposed policy. Awareness of inclusive design is not consistent across Wales and a lack of more specific description of adaptability in this context may lead to limitations in terms of capability to adapt. Such description could include size, positioning, wall materials etc.

*“Homes with occupancy of 6 or more have the barrier free shower facility installed”*

We note that Lifetime Homes requirements in terms of provision of bathrooms is different to the proposed policy. Therefore the policy might want to specify which requirements apply, e.g. Standard 14 from Lifetime Homes. “In dwellings with more than one storey this bathroom should either be on the entrance level (see Note 1), or on a level with potential for access by a through floor lift”<sup>18</sup>.

Implementation and monitoring of compliance with the standard:

As per comments above, the policy does not include this information at the moment. See our response to Question 2.

**6. Do you agree or disagree that it is important for all affordable homes delivered through section 106 agreements and planning conditions to meet the proposed quality standards for new homes? If you disagree, please tell us why.**

We agree. Please see comments in response to question 2.

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<sup>17</sup> <https://www.habinteg.org.uk/whdg3/>

<sup>18</sup> <http://www.lifetimehomes.org.uk/pages/14-bathrooms.html>

**7. What is your opinion on the intention to adopt the proposed new policy for all housing irrespective of tenure? Please explain and provide evidence for your views.**

We agree that the proposed policy should apply to all housing irrespective of tenure. Please see evidence in our response to question 3, section: *Why do we need Lifetime Homes*.

In addition, we are aware of some social landlords citing the inability to compete against private developers who, due to different standards are able to offer more for the land available. One standard would create a level playing field and increase accessibility across the board – with Lifetime Homes or equivalent embedded.

In the course of our engagement with this agenda, we have also come across views that social housing build on private developments ‘looks different’ therefore it can lead to stigmatisation of social tenants (although some developers/law firms increase this stigma through questionable practices<sup>19</sup>). In our opinion, the only right way to minimise the stigma is to increase standards across the board, rather than, as some would argue, lower social housing standard.

**8. What is your opinion of the proposed minimum space standard? Please explain and provide evidence for your views.**

As the proposed new policy includes a requirement to comply with Lifetime Homes standard, we would expect that a comprehensive assessment has been undertaken of the viability of compliance with LTH against the proposed minimum space standard in consultation with an inclusive design expert with detailed technical knowledge of the standard.

**9. With the exception of the Lifetime Homes requirements, the proposed new policy is not prescriptive in relation to inclusivity and notably such matters as, disability, ethnicity, gender, sexual orientation, age, religion, human rights or children’s rights. Do you consider that the proposed new policy is sufficiently inclusive or not.**

**Disability:** Please see our comments on wheelchair accessibility above.

**Ethnicity:** We would encourage the document to make reference to culturally appropriate design. It is important to consider the needs of diverse ethnic communities, when designing new housing and include culturally appropriate design in the mix of housing designs. In our opinion a reference to culturally appropriate design would help raise awareness of the needs of Black, Asian and ethnic minority communities and improve the experiences, wellbeing and health of BAME communities<sup>20</sup>

<sup>19</sup> <https://www.insidehousing.co.uk/news/news/welsh-housing-minister-hits-out-over-warning-to-buyers-about-affordable-housing-62440>

<sup>20</sup> <https://www.taipawb.org/wp-content/uploads/2018/04/GPB9-Cultural-Design-in-Mainstream-Housing.pdf> (Tai Pawb, 2006, access details: Equality18

**Human Rights and Children’s Rights:** Currently, it is common practice for social landlords to let old and new accommodation without providing furnishings, including carpets or alternative floor coverings.

Tai Pawb and TPAS Cymru launched a new report looking into this issue. The report, ‘FLOORED<sup>21</sup>’, lists issues such as a lack of warmth, safety and sound in tenant’s homes, health issues including breathing difficulties and depression. Responses from tenants with children highlighted safety issues with hard concrete or wooden flooring – including splinters – and an increase in isolation and loneliness in not feeling able to invite friends to visit.

Tenants who were surveyed as part of the research also reported that the cost of purchasing suitable flooring was prohibitive and linked largely to low income or a lack of available funds. Moreover, a third of tenants said flooring was provided in their prospective property when they viewed it but, prior to occupation, it had been removed. In many cases, the tenant had earlier requested that the flooring remain.

Key findings from the responses from landlords found that social housing – other than non-slip flooring in kitchens and bathrooms - rarely has any flooring or carpeting fitted when new-lets are taken up. In addition, few providers offer flooring to tenants as standard practice unless a need is identified by an occupational therapy assessment or another process identifying vulnerability.

However, the survey also identified multiple good practice, with several landlords providing flooring in their new homes as standard practice. We would urge the Welsh Government to consider the report and assess viability of a requirement to provide flooring in new housing in this new proposed policy and/or through a review of WHQS.

**10. We are proposing to change the name of DQR to “Beautiful Homes and Spaces” (BHS). What is your opinion of the proposed name change and do you have an alternative suggestion:**

No comment.

**11. Subject to the outcome of the consultation on changes to the Building Regulations Part L (conservation of fuel and power) and Part F (overheating), new regulations will come into force. What is your opinion of the potential early introduction of the conservation of fuel and power and overheating regulations for new affordable housing in advance of any building regulation transitional arrangements?**

We are supportive of early introduction of the conservation of fuel and power regulations for affordable housing. Evidence shows that fuel poverty affects over 150,000 people households

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<sup>21</sup> <https://www.taipawb.org/news-story/social-landlords-urged-to-tackle-lack-of-flooring-in-new-lets/>

in Wales, adding financial as well as mental strain to tenants<sup>22</sup>. As part of the Welsh Government's commitment to ending homelessness, it is important to reduce the energy costs for people on lower incomes, therefore improving people's ability to maintain tenancies and remain in their homes. We welcome regulations that seek to reduce energy waste in housing and would view this as beneficial for tenancy sustainment and the natural environment.

However, it is critical that the Welsh Government works with housing providers to understand the challenges of early implementation. In particular, social housing providers must be given the strategic and financial support to enable them to meet these standards and avoid unintended consequences such as large rent increases or a reduction in affordable housing supply, as this could contribute to increased homelessness and inequality.

**12. What is your opinion on the potential introduction of a requirement that all new affordable housing should meet EPC A (SAP 92)?**

In line with our comments above, we support policies that reduce the financial burden on people on the lowest incomes, recognising the positive effect this has on reducing inequalities and preventing homelessness. However, if this is taken forward, it is essential that the Welsh Government provides strategic and financial support to social landlords to help them to achieve the standard and avoid unintended consequences as above.

**13. We have asked a number of questions. We would welcome any other views you may have about the proposed new policy and the proposals for implementation:**

No comment

**14. We would like to know your views on the effects that the proposed new policy would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

We welcome the proposals for the new standards, and for them to apply regardless of tenure. Including the lifetime homes principles and increasing the consistent application of these standards, potentially increases the opportunities for people to use the Welsh language, by allowing for people to stay within areas where Welsh is a community language. This effect would also be increased if the implementation of the standards was coupled with an increase in the supply and availability of truly affordable houses in these communities.

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<sup>22</sup> <https://rgs-ibg.onlinelibrary.wiley.com/doi/abs/10.1111/tran.12320>

**15. Please also explain how you believe the proposed new policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

As above.

**16. In view of the effect of Covid-19 which will change the way we live in and use our homes, please indicate any additions to the standards and any other suggestions relating to the pandemic you want us to consider**

Covid had unequal impact on underserved or disadvantaged communities in Wales. The over 50% of people who lost their lives to Covid were disabled. Disabled people also felt impact in their homes – with providers often unable to deliver much needed adaptations, speedy hospital discharge processes and higher likelihood of shielding. Considering Wales as the UK in general is experiencing not only housing crisis but an accessible housing crisis, the requirement to ‘stay at home’ would have had a disproportionate impact on the health and wellbeing of many disabled people – who often had to stay at homes which are not accessible and do not meet their basic needs. This was further compounded by the limitations to social services and other support available.

In our view, the above impact, makes a compelling case for Lifetime Homes and a defined wheelchair accessibility standard as per our earlier comments.

Given that many people have been required to work from home during the pandemic, we would like to see the document incorporate references to digital connectivity and access to outdoor space. Whilst we welcome the inclusion of the sufficient space for home working, this should be coupled with minimum standards for digital connectivity. Examples could include adequate speed, use, and data capacity of a connection<sup>23</sup>. A minimum requirement for outdoor space would also be beneficial for occupants’ wellbeing and mental health; in the context of Covid-19 this has become more pressing due to restrictions on people’s ability to access public outdoor spaces such as parks, beauty spots and limits on local movement in general.

Covid-19 has highlighted the importance of ‘home’ and the inequalities faced by people without access to good quality housing. Effective standards, alongside measures to increase supply and ensure affordability, will be key to ensuring that everyone in Wales has access to a home which provides safety, supports health and wellbeing, and reduces inequalities.

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<sup>23</sup> <https://1e8q3q16vvc81g8l3h3md6g5f5e-wpengine.netdna-ssl.com/wp-content/uploads/2020/05/Meaningful-Connectivity.pdf>