

ODPM Consultation PPS3 Housing

Response of the Joint Committee on Mobility of Blind and Partially Sighted People

1. Introduction

- 1.1 The Joint Committee on Mobility of Blind and Partially Sighted People (JCMBPS) welcomes the opportunity to comment. We are happy for our response to be made public.
- 1.2 The Joint Committee is an independent body consisting of representatives of the principle organisations of and for blind, deafblind and partially sighted people with a specific interest in mobility.
- 1.3 It is estimated that there are 9.8 million adults in Britain likely to be covered by the Disability Discrimination Act (22% of the adult population)ⁱ, plus 0.7 million childrenⁱⁱ. There are over a million registered blind and partially sighted people. Almost 2 million people with significant sight lossⁱⁱⁱ would have difficulty, even with the aid of glasses, in recognising a friend across the street. Many also have additional disabilities, particularly hearing loss, and experience serious problems moving around the built environment. Those engaged in planning and providing housing, services and facilities should always take their needs into account.
- 1.4 It is predicted that over the next 30 years
 - The proportion of the population over 65 will increase by 40%
 - The number of people aged over 65 will double;
 - The proportion over 80 will increase by 100% and the total number over 80 will treble
 - Over the same period the overall population will increase by less than 7%.
- 1.5 The growing disabled and older population will have social as well as economic implications if those responsible for the provision of built environments do not recognise and address the need for more inclusive environments.
- 1.6 The ODPM's 2003/4 Survey of English Housing (published in April 2005) indicates that there are an estimated 1.4 million disabled people in England who are in need of specially adapted accommodation. Of this total, nearly one quarter (320,000 people with disabilities) are currently living in unsuitable accommodation.
- 1.7 Research conducted by John Grooms Housing Association has estimated a countrywide shortfall of 300,000 wheelchair accessible homes.

- 1.8 Wales Assembly Government sponsored research conducted by RNIB showed the requirements of blind and partially sighted homes that were not being met and led to the publication 'Housing Sight' (RNIB).
- 1.9 The JCMBPS believes that blind, deafblind and partially sighted people should be able to move around safely and independently. This is currently often not the case and barriers may be physical, operational or attitudinal.
- 1.10 The Joint Committee on Mobility of Blind and Partially Sighted People works with Central and Local Government, and the transport and built environment sectors, to ensure that the requirements of blind, deafblind and partially sighted people and other disabled people are understood and integrated. Policy Statements produced by JCMBPSP include the topics of walking strategies and local transport plans.

2. Response

- 2.1 We welcome the general objective of promoting sustainable and inclusive patterns of urban and rural development.
- 2.2 We also support ensuring decent homes for all to enable individuals and households access to quality housing.
- 2.3 LPAs should have a clear responsibility to take the PPS forward by writing and implementing policies requiring high quality accessible housing so that the onus should be on LPAs to improve standards
- 2.4 The new duties introduced by the DDA 2005 places specific duties on the government, national and local authorities to put in place schemes to overcome areas of inequalities. In accordance with those duties we would strongly recommend that PPS 3 makes explicit reference to inequality of housing provision for disabled people and introduce specific objectives to overcome it.
- 2.5 LPAs should require that all new housing is to lifetime homes standards. The opportunity should be taken to update the lifetime homes concept. For instance the Wales Assembly Government sponsored RNIB research publication adding requirements for blind and partially sighted people to Lifetime Homes standards. LPAs should also adopt policies that seek to address the shortfall in wheelchair housing.
- 2.6 LPAs should require that land released for housing development must be near to or easily connected to public transport infrastructure. Land released should be in close proximity to, and accessible for, essential services, shops and facilities, or if not these elements should be contained within the development proposals with guarantees from the

relevant stakeholders that they will be in place, before planning consent is granted.

- 2.7 The PPS should ensure the land take of infrastructure provision and services like schools, main roads, open space etc are understood and taken into account within land allocation, housing targets and area action plans.
- 2.8 When creating sustainable, inclusive communities in all areas, accessible layout and design would be in accordance with the guidance and best practice to create an inclusive environment for blind and partially sighted people.
- 2.9 The positioning and accessibility of transport links and services and facilities is very important to the success of housing policies. Good quality, safe and accessible pedestrian routes should be provided within housing developments and from housing to services and transport links.
- 2.10 The PPS should set out clear objectives for the management of travel to and from homes. Priorities on new housing in accessible locations, linking remote sites to the provision of transport infrastructure and ensure a mix of services and facilities close to those homes to reduce the need to travel.
- 2.11 The PPS should promote good design as a way of incentivising non-car based transport.
- 2.12 Residential space standards should be promoted. Some technical standards should be included in the Buildings Regulations to avoid repetition but the planning system should also be used to ensure adequate dwelling sizes are based on good design rather than simply meeting minimum standards.

3 Staff Training

There is a requirement for access awareness training of all professionals responsible for the management and operation of planning services. This should include entry level training for new professionals at undergraduate, graduate and other appropriate levels, as well as CPD for current professionals. This is recognised in the European Charters on access and training.^{iv}

Research conducted on behalf of CEBE, Centre for Education in the Built Environment, showed the poor coverage of access issues in many university courses across the range of transport and built environment subjects.

DPTAC has identified the shortage of professionals skilled in integrating accessibility in transport and the built environment as a major barrier in

delivering Government objectives for improved access. Research for DPTAC has revealed the lack of training and resources on access for professionals working in these areas. The Government should effectively support DPTAC's initiatives by actively encouraging professional institutes to set access knowledge and skills as central core requirements for professional recognition and accreditation, and to follow this through to university and other courses leading to professional status.

4. Conclusion

Thank you for the opportunity to comment on this consultation paper. We would appreciate feedback on the issues in our response which will be taken forward, and any aspects of our response that you have concerns about. Should you require any further information or wish to discuss any aspect of this response please do not hesitate to contact me.

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ⁱ Source: DRC Disability Briefing December 2004 from Family Resources Survey, 2002-03. Great Britain. Based on the DDA definition of disability and the publication of a *User's guide to disability estimates and definition*, available online at <http://www.dwp.gov.uk/asd/asd5/ih2003-2004/IH128userguide.pdf> In the Family Resources Survey (FRS) an adult is defined as all those aged 16 and over, except for 16 to 18 year olds in full time non-advanced education.

ⁱⁱ Source as above. In the Family Resources Survey (FRS) a child is defined as someone aged under 16, and aged 16 to 18 year olds who is in full-time non advanced education and living at home.

ⁱⁱⁱ Figures from the 1999 DSS Research report No.94 'Disability in Great Britain' indicated there were an estimated 1.97 million people with a significant sight loss.

^{iv} ECMT, 1999, Charter on Access to Transport Services and Infrastructure. Available at <http://www1.oecd.org/cem/topics/handicaps/pdf/tphCharter.pdf>

^{iv} Council of Europe, 2001, Resolution ResAP(2001)1 on the introduction of the principles of universal design into the curricula of all occupations working on the built environment. Available at <http://cm.coe.int/ta/res/resAP/2001/2001xp1.htm>