
An inquiry into the housing experiences
of Deaf and Disabled Londoners and
the supply of accessible and affordable
housing in London

Summary Report



Barriers at Home

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1. Introduction



This report outlines the findings of a research project conducted by Inclusion London between 2023 and 2024. The focus of the report is the supply of accessible and affordable housing in London. This research was carried out in response to concerns expressed by Deaf and Disabled Londoners about accessibility and affordability barriers they experience in housing.

This research set out to explore the housing conditions of Deaf and Disabled Londoners across different tenures, capturing the lived experiences of Deaf and Disabled Londoners, and investigate what decision-makers at different government levels are doing to address the need for accessible and affordable housing.



Definitions

About Inclusion London

Inclusion London is a pan-London disability equality organisation, run by and for Deaf and Disabled people.

- We believe in the **social model of disability**. It says that people with impairments are disabled by the way society is run and organised. It advocates for removing societal barriers to achieve equality and justice for Disabled people.
- We also believe in the **cultural model of Deafness**, which celebrates Deaf people's unique linguistic and cultural identity.



Photo: Simon Lamrock

What do we mean by Disabled People?

We use the term Disabled people to cover all groups of people with impairments including:

- Neurodivergent people, people with learning difficulties and people who experience mental trauma or distress
- people with mobility impairments, visual impairments and hearing impairments
- people with long-term health conditions and invisible impairments.

Inclusion London's Housing Project

Inclusion London facilitates a **London DDPOs Housing Network**. The network brings together user-led organisations running housing campaigns and/or delivering housing advice to Deaf and Disabled people, as well as grassroots housing groups and coalitions, who are working to improve the lives of people living in social housing and the private rented sector.

What do we mean by the supply of accessible housing?

- An accessible home contains all the necessary features to enable the person living there to move around safely and easily, use all its facilities and enter and exit the home freely.
- Physical accessibility features include ramped entrances, level access showers, stair lifts, and spacious rooms to accommodate mobility equipment.
- Non-mobility-related features include noise-reducing insulation, flashing doorbells, temperature regulation and adjustable lighting.
- Accessibility is considered in the context of the wider built environment. This includes access to the area around a house as well as shops, transport, healthcare services and amenities.
- By 'supply of accessible housing', we refer to homes that are designed and built to be accessible from the outset.

Research aims

Our research aims to:

- 1. Identify key accessibility and affordability challenges Deaf and Disabled people face in their homes.**
- 2. Understand the impact of living in unaffordable and inaccessible housing on Deaf and Disabled people's lives.**
- 3. Evaluate how local authorities gather and use data to plan and build accessible homes for Disabled people.**
- 4. Investigate the barriers local authorities face in building accessible and affordable homes.**
- 5. Assess the effectiveness of the London Plan's policies and funding programmes at increasing the supply of accessible and affordable housing in the city.**

Value of the research

- Most studies on accessible housing have been conducted by organisations which are not user-led. This research has been carried out by a user-led organisation, run by and for Disabled people, and co-produced entirely with Deaf and Disabled people and DDPOs.
- Our research is focused specifically on the housing experiences of Deaf and Disabled people in London, unlike most research which has been conducted on a national scale.
- Our research takes a broader view of accessible housing, extending beyond the needs of people with mobility impairments and wheelchair users. There has been little research on the housing needs of neurodivergent people, blind and partially sighted people and those with learning difficulties and sensory impairments, in general needs housing.
- Unlike most research, which typically focuses on either accessibility or affordability, we explore the link between accessible and affordable housing. We examine the impact that both elements have on Disabled people's quality of life and independent living.



Photo: Guilhem Baker

2. Research methodology

The evidence collected and considered in this report includes local and national data, surveys and interviews with Deaf and Disabled people, as well as interviews with local authorities' planning and housing teams, who are responsible for planning and building homes for residents.

We used a combination of primary and secondary research methods.

Secondary Research

1. Literature review

We reviewed existing research and datasets on the housing experiences of Deaf and Disabled Londoners, focusing both on accessibility and affordability.

2. Analysis of Greater London Authority (GLA) data and policies

We examined data collected and policies developed by the GLA on the demand and supply of accessible and affordable homes in London.

3. Analysis of local authorities' development plans and local housing market assessments (SHMAs)

We assessed the data collected by local authorities through Local Plans and SHMAs to evaluate their planning for adequate affordable and accessible housing provision.

Primary Research

1. Survey of Deaf and Disabled Londoners

We conducted an online survey to capture the housing experiences of Deaf and Disabled Londoners. 84 individuals across impairment types responded to the survey.

2. Interviews with Deaf and Disabled Londoners

We carried out qualitative interviews with 22 Deaf and Disabled Londoners to gain deeper insights into their housing experiences.

3. Freedom of Information (FOI) Requests to London councils

We submitted FOI requests to all 33 London local authorities to determine whether they monitor specific data related to accessible and affordable housing. 31 councils responded to our requests for data.

4. Interviews with local authorities

We interviewed staff from 6 local authorities, primarily working within planning and housing teams, to understand the challenges they face in building accessible and affordable homes, and the potential solutions they suggest.

3. Summary of literature review



The state of accessible housing in London?

National context

- There is a significant unmet demand for accessible housing in England, with **1.8 million households needing accessible homes, including 580,000 working-age adults.**¹
- The existing housing stock across England is not accessible or adapted to meet Disabled people's requirements, **with only 9% of existing homes offering minimal accessibility features.**²
- The shortage of wheelchair accessible housing is particularly acute, with **400,000 wheelchair users currently living in unsuitable housing.**³
- England's Building Regulations have produced generally inaccessible housing.
- **All new homes need to be built to the M4(1) visible standard, the lowest housing accessibility standard. M4(2) accessible and adaptable standards and M4(3) wheelchair user standards continue to be optional.**⁴

Only 9%
of existing
homes
offer minimal
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All new homes need to be built to the **M4(1)** visible standard, the lowest housing accessibility standard. **M4(2)** accessible and adaptable standards and **M4(3)** wheelchair user standards continue to be optional.



Only 3%
of existing homes in
London are visitable

Photo: Tojo Andrianarivo for Disabled and Here

London context

- The London Plan mandates that 90% of new homes must meet M4(2) accessible and adaptable standards, and 10% must meet M4(3) wheelchair user standards.⁵
- Despite these higher standards, wheelchair users in London are more dissatisfied with their homes than those in the rest of the country.⁶
- **Only 3% of existing homes in London are visitable.**⁷
- **There are 200,000 households in London that include a Disabled person who requires adaptations for their home to be accessible.**⁸
- Most local authorities in London are consistently failing to meet accessible housing targets.
- Overall, data on the accessibility of the housing stock in London and the housing needs of Deaf and Disabled Londoners is scarce. This makes it difficult to assess whether housing meets their needs.

Disabled people's preferred housing tenure in London

- Deaf and Disabled people are predominantly represented in social housing. **In 2020/21, 31% of Disabled Londoners lived in social housing, compared to 10% of non-Disabled residents.**⁹
- Many Disabled Londoners are living in the private rented sector due to shortage of accessible social rent housing.
- Disabled people in London face greater housing affordability challenges due to lower-than-average incomes and higher costs.
- **30% of families in London that include a Disabled person are in poverty.**¹⁰
- **More than half of Disabled Londoners who are renting or paying a mortgage struggle to pay their housing costs.**¹¹
- Disabled households often incur additional costs, such as higher utility bills, to manage their impairments. This strains their budgets further.¹²
- **A significant number of individuals on the social housing waiting list in London (23,397) require accommodation for medical or welfare reasons,** underscoring the urgent need for accessible social housing.¹³



30%
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Photo: Age Without Limits

4. Summary of key findings



1 in 4

respondents live in completely inaccessible homes, where they cannot safely and easily use basic facilities like kitchens, bathrooms and entryways

Photo: Age Without Limits

Disabled people's housing experiences

Accessibility barriers

This research explores the accessibility barriers Deaf and Disabled Londoners face in their homes and their local areas, and the impact these have on their physical and mental health.

Inaccessible homes across all housing tenures

- Deaf and Disabled Londoners across all impairment types, told us they experience significant accessibility issues in their homes. This was the case across all housing tenures.
- **When asked if their home was accessible, 1 in 4 Deaf and Disabled people who answered this question said their home is completely inaccessible. This means they cannot safely and easily use basic facilities like kitchens, bathrooms and entryways.**



Photo: Age Without Limits

Who needs accessible housing?

- Most respondents with mobility impairments reported needing housing accessibility features. **1 in 3 respondents with mobility impairments do not have level access in their homes.**
- It is not just people with mobility impairments. Neurodivergent people, those with mental health support needs, Deaf people and those with sensory and visual impairments, also need accessibility features.

Common accessibility barriers in people's homes

- Across all impairment types, most Disabled people reported lacking accessibility features in various areas of their home, including their kitchens, bathrooms, other rooms as well as the exterior of the house.
- Many lack physical accessibility features they need to get into their homes easily, such as level access and wide doorways, as well as features they need to use the bathroom and the kitchen. **1 in 4 respondents lack accessibility features they need to use the toilet. 1 in 6 respondents lack features to use the bath/shower.**

- Several Disabled people also struggle with poor lighting, lack of noise-reducing insulation, lack of thermal comfort and layouts which impact wayfinding. **1 in 5 respondents don't have the noise-reducing insulation they need in their homes.**
- The lack of accessibility features in the home can exacerbate impairments and prevent Disabled people from accessing their homes' facilities.
- **It is essential that accessible housing is not exclusively seen as housing that has good quality physical features, but also non-physical features such as lighting, acoustics, thermal comfort and wayfinding.**

Inaccessibility of the local area

- Over half of our survey respondents felt that their local areas were not accessible. This was due to lack of accessible transport networks, healthcare facilities, shops and services near their homes, as well as challenges in navigating the street space.
- These barriers limit their ability to engage in community activities and live independently.
- **Accessible homes need to be built and allocated in areas of London with good accessible transport networks. We must consider the accessibility of the street space as well as proximity of homes to essential services, such as shops, healthcare facilities, and support networks to enable Disabled people to live full and independent lives.**

The impact of inaccessible housing

- Living in unsuitable accommodation compromises Deaf and Disabled people's physical and mental health and deprives them of their rights to living independently.
- Most participants said that they sustain injuries and experience chronic stress, anxiety and depression as a result of living in inaccessible homes. Some people are hospitalised due to experiencing a deterioration in their mental health.

- Social isolation and the loss of independence were also cited as key issues. Many individuals reported leaving their homes less frequently due to housing inaccessibility and depending on others to carry out routine tasks.
- **To reduce health inequalities, we must tackle accessibility barriers Deaf and Disabled Londoners face within and outside their homes, particularly the accessibility of local areas in which new accessible and wheelchair accessible homes are built.**

Affordability barriers

This research also explores the housing affordability challenges Deaf and Disabled Londoners face, and the impact these have on their physical and mental health.

High housing costs and financial strain

- Most Deaf and Disabled Londoners across various tenures said they struggle to afford housing costs.
- **Of those respondents who shared details about their housing costs, 1 in 6 respondents spend over 50% of their income on rent or mortgage.**
- **1 in 3 respondents had to cut back on food and/or other essentials to afford housing costs.**
- **1 in 3 respondents had to cut back on gas and electricity to afford housing costs.**

1 in 6

respondents spend over 50% of their income on rent or mortgage

1 in 3

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Photo: Age Without Limits

1 in 4

respondents lack accessibility features they need to use the toilet. 1 in 6 respondents lack features to use the bath/ shower

- Many Disabled households we spoke to also found it difficult to manage financially because they face disability-related extra costs, including costs for therapies, heating and mobility equipment.
- Social housing tenants and private renters are particularly affected by the lack of affordable housing.
- Disabled Londoners living in social housing and the private rented sector are at the sharpest end of the housing crisis. They face rents increases, and unregulated service charges which negatively impact their physical and mental health.

The impact of unaffordable housing

- Living in unaffordable housing disproportionately impacts Deaf and Disabled people's health and well-being.
- Many of our respondents experienced a deterioration in their physical health due to having to cut back on expenses that are crucial to manage

their conditions and impairments. These included heating, therapies and other essential activities.

- Not being able to afford housing costs severely impact people's mental health. This generates new impairments and worsens existing ones, such as chronic stress, anxiety, and depression, and overall, decreases people's sense of self-esteem.

Security of tenure and housing stability

- **Security of tenure**, the feeling of being able to live in a home long-term, matters to Disabled people's overall well-being.
- Disabled Londoners living in the private rented sector are particularly dissatisfied with their tenure, due to unregulated rents and high risk of eviction. This sense of insecurity discourages tenants from requesting essential housing adaptations, as landlords may perceive these requests as complaints rather than reasonable adjustments.
- In contrast, social housing tenants and owner-occupiers generally report greater satisfaction due to housing stability and a sense of community, which allows them to better manage their health.
- However, Disabled people living in housing associations are more dissatisfied with their tenure than council tenants, primarily due to higher rents and high service charges.

House shares and temporary accommodation

- Many Disabled Londoners in the private rented sector are forced to share accommodation with others to save on housing costs. This is often unsuitable for neurodivergent people and those with sensory needs.
- The lack of genuinely affordable accessible housing in London increases the risk of homelessness for Disabled people.
- Some respondents ended up in **temporary accommodation** (TA). This is largely inaccessible to Disabled people, exacerbating existing impairments as well as creating new ones.

An inconsistent approach to planning

Our research highlights that Deaf and Disabled Londoners have a significant unmet need for accessible affordable housing. While demand for accessible homes across all tenures is high, the shortage of accessible homes is particularly acute in the social rented sector. The need to boost accessible social housebuilding has never been greater. Matching accessible social rent supply closely with demand is crucial to address Disabled people's housing need.

Limitations in data collection and gaps in monitoring processes

Local Authorities

Inaccurate assessment of housing needs

- To ensure we build the homes people need, Disabled people's housing requirements have to be accurately identified and built into the planning and delivery of the supply of new homes.
- However, most councils' local plans are not fit for purpose because they rely on a very weak evidence base.
- Most local planning authorities in London are not effectively assessing the housing needs of Disabled residents.
- They lack accurate data on people's housing requirements, including people's impairments, housing accessibility need, tenure type and size of the property needed, proximity requirements to support networks and services.

Limited knowledge of the existing housing stock

- Most councils have limited knowledge of the accessibility of their existing housing stock.

- There is a lack of consistency among local planning authorities about data collection and monitoring practices. There is significant variation in how councils categorise accessible homes, making it difficult to understand the availability of suitable housing across London.
- There is also a lack of cross-team coordination between planning and housing teams. Planning and housing departments work in silos and do not share the necessary data with each other to be able to plan, deliver and allocate the right kind of housing to Disabled people.
- Most local authorities also do not have an accurate knowledge of the affordability of the accessible homes being built in their area.
- Most councils do not collect and monitor data on accessible homes being built in their areas alongside tenure.
- **Only 2 London councils provided us with the complete tenure breakdown of their approvals and completions for new build accessible homes.**



Photo: Age Without Limits

Only 2

London councils provided us with the complete tenure breakdown of their approvals and completions for new build accessible homes

Greater London Authority (GLA)

Data gaps in the London Strategic Housing Market Assessment (SHMA)

- The GLA's SHMA sets out estimates of London's current and future housing requirements, to inform the development of the Mayor's London Plan and London Housing Strategy.
- However, the GLA's evidence base for assessing current and future Deaf and Disabled people's housing need is not sufficiently robust.
- This is because it does not accurately capture the current and future unmet need for accessible affordable housing in London and does not include estimated projections of how many accessible homes, broken down by tenure, are needed every year to meet the identified need.

Data Gaps in the London Planning Datahub and London Plan Annual Monitoring Reports

- The GLA develops Annual Monitoring Reports (AMR) to monitor the implementation and assess the effectiveness of the London Plan. Data analysed in AMR are drawn from the London Planning Datahub, an interactive tool that holds information on planning applications, approvals and completions of new-build homes in London.
- We found that the GLA's data collection on new-build accessible homes is inadequate because it does not capture and monitor data on the tenure of new build accessible homes in London.
- It is therefore not currently possible to assess if and how many affordable homes are built to accessibility standards and how many accessible homes are built for social rent or market housing.
- **These data gaps limit the GLA's ability to assess the supply of accessible affordable housing in London and build a robust evidence base to plan and deliver the right kind of housing.**

Are we planning and building accessible homes in London?

Our research highlighted that the planning policies and practices of the GLA and local authorities in London are not entirely adequate to support the delivery of accessible social rent housing. More needs to be done to boost accessible social housebuilding.

Accessible housing targets are not being met

- The London Plan sets ambitious targets for accessible housing. It requires 90% of new homes to meet the M4(2) accessible and adaptable standard, and 10% to meet the M4(3) wheelchair user standard.
- However, compliance with these targets has significantly decreased in recent years.
 - **M4(2) homes:** Approvals dropped from 58% in 2018/19 to just 1.58% in 2022/23. Completions fell from 62.82% to 36.21% over the same period.
 - **M4(3) homes:** Approvals dropped from 8.41% to 3.75%, and completions fell from 9.61% to 4.52%. This decline is alarming given the high demand for accessible and wheelchair user homes in London.

Gaps in accessible housing policies and targets

- According to local authorities we interviewed, there is an acute shortage of wheelchair accessible homes and the 10% target for the delivery of wheelchair user homes in London might not be sufficient to address demand.

Wheelchair adaptable vs wheelchair accessible homes

- According to Policy D7 in the London Plan, 10% of new build homes in London need to be built to M4(3) wheelchair user standards.
- The London Plan currently does not distinguish between M4(3)a wheelchair adaptable and M4(3)b wheelchair accessible standards in its targets for new-build properties, overlooking the differences between the two standards.
- The GLA also does not capture and publish data on the number of 'wheelchair accessible' and 'wheelchair adaptable' homes being built in London.
- Therefore, it is not possible to monitor if and where fully wheelchair accessible homes are being built in London.
- M4(3)a properties require adaptations to bathrooms and kitchen to be fully wheelchair accessible. M4(3)b properties are immediately accessible for a wheelchair user to move in.
- Developers tend to build wheelchair **adaptable** homes rather than fully wheelchair **accessible** homes, as they are cheaper and more profitable.
- Adapting homes that could be built to fully wheelchair accessible standards from the outset is an issue because:
 - It leads to cost-inefficiencies for local authorities and national government who need to resort to Disabled Facilities Grants (DFG) funding.
 - It prolongs the period wheelchair users need to live in unsuitable accommodation because they cannot use the kitchen and the bathroom in their home.

Are we building and acquiring accessible homes that are genuinely affordable?

A disconnect between accessible and affordable housing policies in the London Plan

Our findings suggest that the ties between housing insecurity, unaffordability and inaccessibility are often overlooked by London decision-makers. Not enough attention is being paid to increasing the supply of accessible and wheelchair accessible social rent homes.

The Greater London Authority

- In the London Plan, there is a total lack of coordination between affordable and accessible housing targets.
- The GLA does not assess whether local authorities are building accessible homes that are affordable.
- It also does not provide any analysis or explanation as to why most London boroughs are failing to meet the London Plan targets for accessible housing, as the supply of accessible homes is not a Key Performance Indicator (KPI).

Local authorities

- Most councils in London do not set targets for affordable accessible housing.
- 24 out of 33 London boroughs made no plans for affordable accessible homes.

Are wheelchair user homes in the right tenure?

- No policy in the London Plan guarantees that the delivery of wheelchair user homes is distributed equally across affordability categories.
- According to Policy D7 in the London Plan, wheelchair user homes need to be built across all tenures to provide genuine choice to Disabled residents about the tenure they want to live in.
- However, poverty rates among Disabled people are shockingly high in London and the shortage of accessible and wheelchair accessible homes is particularly acute in the social rented sector.
- Building accessible housing in and of itself will not reduce health inequalities for Disabled people.



24 out of 33

London boroughs made no plans for affordable accessible homes

Photo: Disabled and Here



Photo: Age Without Limits

Barriers to the delivery of accessible and wheelchair accessible social rent homes: local authorities' insights

Right to Buy

- Right to Buy continues to deplete the social housing stock in London because homes are sold off to the private market.
- The scheme acts as a significant barrier to retaining homes in the social rented sector and disincentivises councils to build more public housing.

Funding barriers

- Some local authorities cited insufficient grant funding as a barrier to building accessible social rent homes in London.

Barriers in the planning system

- Most local authorities require private developers to build a certain proportion of accessible and affordable housing in their boroughs through Section 106 agreements, also known as planning obligations.
- Viability assessments are used by developers to challenge conditions imposed by councils.
- Developers are often reluctant to build accessible social rent homes, as they see them as less profitable. They renegotiate section 106 agreements with councils to reduce their costs, arguing that it is not viable to deliver accessible social rent homes.
- Local authorities planning departments lack the expertise and the capacity to properly analyse and challenge viability appraisals.
- Councils also struggle to challenge developers' attempts to cut corners on the design of accessible homes and check new developments meet the accessibility standards developers claim, post-completion. This is due to limited knowledge of accessibility and inclusive design standards.
- Councils need significant resourcing and skills to plan and deliver the homes Disabled Londoners need.
- **However, without reforming the viability assessment process as a whole and reducing developers' profit margin expectations, increasing skills and capacity would only partially address the problem.**

Are affordable homes “genuinely affordable” for Deaf and Disabled people?

- For most Disabled Londoners we interviewed, social rent is often the only tenure that can provide the affordability and security they need.
- In the London Plan, social rent is one of the Mayor’s preferred affordable housing tenures, alongside London Affordable Rent and other intermediate products, such as shared ownership.
- However, making social rent a priority alongside intermediate products, does not help tackle the disproportionate impact the housing crisis has on Deaf and Disabled people because most cannot afford intermediate products.
- The backlog of unmet demand for social rented homes is far greater than that for both affordable rent and shared ownership.
- **There is therefore a special need for far greater numbers of accessible social rent homes to meet the housing needs of Deaf and Disabled people.**



Social rent is often the only tenure that can provide the affordability and security Disabled Londoners need

Photo: Age Without Limits

Is funding under the Affordable Homes Programme (AHP) adequate to deliver accessible and wheelchair accessible social rent homes?

Funding allocations under the AHP: low-cost vs intermediate products

- As a condition of London receiving funding for the AHP 2021–2026, the Mayor and the Government agreed that 53% of AHP funding should be allocated to the delivery of social rent homes. The remaining 47% should be allocated to intermediate products, such as shared ownership.¹⁴
- However, most Disabled people we interviewed cannot afford intermediate products.
- This funding balance might not therefore be appropriate to significantly boost the social homebuilding that most Deaf and Disabled people need.
- **AHP funding in London should be predominantly directed towards supporting providers with the costs of social rent housing, given the high costs of building social rent homes.**

Grant funding under the AHP is insufficient

- Building accessible and wheelchair accessible homes in the social rented sector is expensive because these homes require more land and therefore cost more to build.
- The GLA receives funding from national Government to support housing providers with the costs of building affordable homes.
- However, grant rates negotiated by the GLA with central Government do not seem to factor into their calculations the higher costs of building accessible and wheelchair accessible homes in the social rented sector.
- Grant funding received by the GLA under the AHP is therefore unlikely to be sufficient to increase the supply of new build accessible social rented homes, particularly of wheelchair accessible homes.

- There is an urgent need to significantly increase AHP funding in London to deliver accessible and wheelchair accessible homes in the social rented sector.

Is the GLA maximising opportunities to increase the supply of accessible social rent homes through acquisitions of existing homes?

Funding conditions and grant rates under CHAP

- We cannot just build our way out of the growing housing crisis in London. Boosting acquisitions of market homes to convert them for social rent is crucial to address the shortage of social rent housing in the capital.
- The GLA's Council Housing Acquisitions Programme (CHAP) has many benefits but more needs to be done to embed accessibility into every aspect of the programme.
- Acquiring market homes in London to repurpose them for social rent is costly. Acquiring accessible homes and/or larger homes that can be adapted to meet Disabled people's housing needs is even more expensive due to size and accessibility features.
- Grant rates for acquisitions set by the GLA are fixed rather than negotiable, making it difficult to acquire accessible and adaptable homes.
- It is therefore unlikely that funding conditions and grant rates set by the GLA for acquisitions of existing homes under CHAP can enable local authorities to acquire accessible and wheelchair accessible homes from the outset, or acquire larger homes that can be adapted to meet Disabled people's housing needs.
- **There is a specific need to increase funding under the AHP to boost acquisitions and maximise opportunities to retrofit homes to the highest possible accessibility standards.**

- There is also the need to review existing funding conditions and set grant rates. This would enable providers to negotiate grant rates for homes, rather than bidding for funding according to set grant rates, providing them with greater flexibility.

Data gaps on homes acquired

- Currently, housing providers acquiring homes to repurpose them for social rent or temporary accommodation do not collect and publish any data on the accessibility of the homes acquired.
- Without this data, councils and the GLA cannot determine the accessibility level of existing homes, assess the supply of accessible housing and allocate accessible homes to those who need them most.



Photo: Disabled and Here

Boosting acquisitions of market homes to convert them for social rent is crucial to address the shortage of social rent housing in the capital

5. Conclusion and recommendations



- Improving the housing conditions of Deaf and Disabled Londoners requires systemic change and firm, public commitments and targets to effect that change.
- Without robust commitments and policies, Deaf and Disabled people in London will continue to live in unsuitable housing, with disastrous consequences for us and society at large.
- **We believe the GLA, London councils and national Government should all make accessible housing a priority and urgently work together to massively increase the supply of accessible social rent homes in London.**
- **To maximise the delivery of accessible social rent homes from new developments, we not only need to tackle barriers in the planning system but also significantly increase investment in accessible social rent homes.**
- We cannot just build our way out of the growing housing crisis in London.
- **We believe the GLA, local authorities and national Government should all work collaboratively to retain and retrofit existing homes in the social rented sector to address the backlog of unmet demand. They should also boost acquisitions of market homes to repurpose them for social rent and maximise opportunities to retrofit them to the highest possible accessibility standards.**
- This report points to key measures that central Government, local authorities and the Mayor of London can take to tackle the affordability and accessibility barriers Deaf and Disabled Londoners experience in housing.
- All of our recommendations were co-produced with our DDPOs Housing Network.

Recommendations for the Greater London Authority (GLA)

New build housing

The GLA should:

1 Make accessible housing a key priority of the next London Plan, the next Mayor's Housing Strategy and the next Health Inequalities Strategy by:

- incorporating an explicit, clear definition of "accessible housing" in the London Plan and the Mayor's Housing Strategy. This must go beyond physical accessibility and consider the needs of people with a wide variety of impairments. The definition should reference Part M of the Building Regulations and the guidance BSI Design for the Mind PAS 6463.
- ensuring the next Mayor's Housing Strategy sets out a clear and ambitious plan for increasing the supply of general needs accessible housing that goes beyond the provision of specialist and supported housing.
- ensuring the Mayor's Health Inequalities Strategy recognises inaccessible housing as a major driver of health inequalities for older and Disabled people. It should include a commitment to ensure all Deaf and Disabled people can live in safe, accessible and affordable homes.
- including the 'Supply of affordable and accessible homes' as a Key Performance Indicator (KPI) in the next London Plan.

2 Act urgently to ensure existing accessible housing targets are met by:

- setting up a taskforce comprised of members from across local authorities in London, tasked with investigating the reasons behind the declining trend in local authorities' compliance with accessible housing targets. This taskforce would share best practice and develop solutions to tackle barriers hindering the delivery of accessible housing.
- setting an expectation in the London Planning Guidance that all London boroughs need to create and fund Access Panels to provide critical oversight and advice to local planning authorities on the accessibility of development proposals at planning application. These panels should include access officers and Disabled people with a wide variety of impairments from the local community. The role of Access Panels should be to ensure housing accessibility standards are met and to actively challenge proposals that fall short of accessibility and inclusive design standards.
- providing better guidance to housing providers about accessible housing and inclusive design standards. We recommend that the GLA incorporates Habinteg's Inclusive Design Housing Guide in their London Planning Guidance, as well as the BSI standard on neurodiversity and the built environment.

3 Explicitly encourage the delivery of new build M4(3)b fully wheelchair accessible homes in the next London Plan by:

- setting targets for net completions of fully wheelchair accessible homes (M4(3)b) and wheelchair adaptable homes (M4(3)a) and monitoring boroughs' compliance with these targets. We recommend setting higher targets for net completions of fully wheelchair accessible homes.
- assessing whether the 10% target for new build wheelchair user homes is sufficient to meet the housing needs of wheelchair users.

4 Improve data collection on Disabled people's housing needs and the accessibility of the housing stock in London to accurately plan and deliver the homes we need by:

- ensuring that the next London Strategic Housing Market Assessment (SHMA) accurately captures current and future unmet need for affordable accessible housing in London and includes estimated projections of how many accessible homes by tenure are needed every year to meet the identified need.
- developing a standardised and robust methodology for collecting data about Disabled people and their housing needs and ensuring that data collected for the Strategic Housing Market Assessment can be broken down by disability.
- capturing and publishing data on the number of new build 'wheelchair accessible' and 'wheelchair adaptable' homes being built in London. This data should be published annually in the Planning London Datahub and the London Plan Annual Monitoring Report.

- requiring social housing providers to collect data on how many new build affordable homes funded through the Affordable Homes Programme are built to M4(2) accessible and adaptable standard, M4(3)a wheelchair accessible and M4(3)b wheelchair adaptable homes standard. This data should be published as part of the GLA's quarterly statistics on affordable housing starts and completions, the London Plan Annual Monitoring Report and the London Assembly Housing Committee's Affordable Housing monitor on annual basis.
- capturing and publishing data on accessible housing units starts and completions by tenure. This data should be published as part of the GLA's quarterly statistics on affordable housing starts and completions and the London Plan Annual Monitoring Report.

5 In the next London Plan, require boroughs to deliver higher levels of social rent accessible and wheelchair accessible homes by:

- making social housing the sole priority tenure within the next London Plan.
- increasing the minimum percentage of social rent homes to be delivered by boroughs from 30% to at least 60% as part of the affordable housing tenure mix.
- ensuring all London's Plan policies on affordable housing make explicit reference to accessible and inclusive housing design requirements.
- requiring a minimum percentage of new build M4(3) wheelchair user homes to be built in the social rented sector.

6

Give housing providers in London sufficient capital grant funding to enable the delivery of accessible and wheelchair accessible social rent homes by:

- making social housing the priority tenure within the GLA's Affordable Homes Programme (AHP) funding guidance.
- allocating at least 80% of the Affordable Homes Programme (AHP) grant money received by central Government to social rent, with the remainder split broadly equally between other affordable housing tenures.
- negotiating with central Government a significant increase in capital grant funding under the AHP to support providers with the costs of developing social rent homes of different sizes to accessibility standards set in the London Plan. The amount of funding requested should be based on an accurate review of the effectiveness of existing grant funding rates in supporting the delivery of accessible and wheelchair accessible social rent homes of different sizes. Any future affordable housing funding gap analysis should reflect the higher costs of building accessible and wheelchair accessible homes in the social rented sector.

Existing housing stock

The GLA should boost acquisitions of market homes to repurpose them for social rent and maximise opportunities to retrofit them to the highest possible accessibility standards by:

- requiring local authorities to collect and provide data regarding the accessibility of homes acquired through the GLA's council acquisitions programmes as a funding condition. The accessibility level of acquired homes should be measured based on accessibility standards included in Part M of the Building Regulations 2010: M4(1) visitable, M4(2) accessible and adaptable, M4(3)a wheelchair adaptable and M4(3)b wheelchair accessible.
- considering changing funding conditions for acquisitions, enabling providers to negotiate grant rates for homes rather than bidding for funding according to set grant rates. This would give housing providers flexibility to acquire more expensive accessible and wheelchair accessible homes and/or larger homes that can be adapted to meet Disabled people's needs and repurpose them for social rent or temporary accommodation.
- offering additional grant making to housing providers, as part of the programme, to enable them to adapt acquired homes and communal areas to the highest possible accessibility standard (M4(2) or M4(3)) and ring-fence this funding from the Affordable Homes Programme.

Recommendations for Local Authorities

New build housing

Councils should:

1 Make accessible housing a key priority of their local Health and Wellbeing Strategies and local Housing Strategies by:

- ensuring their Health and Wellbeing Strategies recognise inaccessible housing as a major driver of health inequalities for older and Disabled people, and prioritising increasing the supply of accessible social rent housing.
- ensuring their local housing strategies set out clear and ambitious targets and plans for increasing the supply of accessible and wheelchair accessible social rented housing in their local areas.
- treating the London Plan's target of 10% wheelchair user housing as a minimum requirement and exceeding it if their local housing needs assessments indicate a significantly higher need for such type of housing.
- setting a minimum percentage of wheelchair accessible homes to be built for social rent.

2 Comply with accessible housing targets by:

- increasing their knowledge of inclusive design and accessible housing standards.

- creating, training and resourcing Access Panels made up of access officers and Disabled people with different kinds of impairments. They should have a seat at the Planning committee and be tasked with reviewing planning applications for developments, ensuring accessibility standards are met.
- ensuring developers build the accessible homes they promise by checking new developments' compliance with accessibility standards within 6 months post-completion, in collaboration with housing occupational therapists (OTs).

3 Enhance data collection on Disabled people's housing needs and the accessibility of housing stock in their local area, in order to plan and deliver the affordable accessible homes people need by:

- collecting good quality data about Deaf and Disabled people's housing needs, including their impairments, tenure type, size of the property needed, housing accessibility needs, and proximity requirements to support networks and services. This data should be included in local strategic housing market assessments and local development plans.
- collecting data on the number of new build homes in their local area that meet M4(2) accessible and adaptable standards, M4(3)a and M4(3)b across all tenures. This information should be included in local strategic housing market assessments and local development plans.
- clearly recording the level of accessibility of their housing stock, including homes acquired through the GLA's council acquisitions programmes. This information should be included in local accessible housing registers. Data should be regularly monitored and reviewed, and accessible housing registers should be updated accordingly.

Where councils do not own any social housing stock, they should work collaboratively with housing associations and other registered social housing providers to collect and monitor this data.

Existing housing stock

Councils should:

- prioritise acquisitions of accessible and wheelchair accessible homes and/or larger homes that can be adapted to meet Disabled people's needs and repurpose them for social rent or temporary accommodation.
- retrofit existing homes and homes acquired through the GLA's council acquisitions programmes to the highest possible accessibility standards (M4(2) and M4(3)), ensuring they allocate homes adapted to M4(3) standards to wheelchair users.
- avoiding removing housing adaptations to meet the needs of future Disabled tenants.
- consider repurposing for social rent new build market homes, that have benefitted from public grant, subsidy or discount, and that are built to wheelchair user home standards, if they are not purchased by wheelchair users within 6 months from completion.

Recommendations for National Government

New build housing

National Government should boost council house building in London by:

- giving the GLA the flexibility to make social housing the priority tenure when distributing funding to housing providers.
- giving the GLA the flexibility to allocate at least 80% capital grant funding to social rent housing when negotiating funding conditions for subsidies under the Affordable Homes Programme (AHP).
- significantly increasing grant funding under the AHP to enable local authorities in London to increase the supply of accessible social rent homes. Grant rates for London should be particularly increased to ensure a large proportion of fully wheelchair accessible homes are delivered in the social rented sector.
- reforming the viability assessment process, bringing developers' profit margin expectation below 15% in the National Planning Policy Framework (NPPF).
- adequately resourcing local authorities planning departments to enable them to develop local plans that are fit for purpose, and challenge developers using 'viability assessments' to reduce the delivery of accessible and affordable housing.

Existing housing stock

National Government should work with the GLA to retain and retrofit existing social rent homes, boost the resocialisation of market homes and maximise opportunities to retrofit them to the highest possible accessibility standards by :

- providing the Greater London Authority with additional grant funding under the Affordable Homes Programme (AHP) to enable councils to:
 - acquire accessible and wheelchair accessible homes and/or larger homes that can be adapted to meet Disabled people's needs and repurpose them for social rent
 - adapt acquired homes and existing homes to the highest possible accessibility standard (either M4(2) or M4(3)).
- ending the sell-off of affordable/social rent homes by abolishing Right to Buy to retain homes in the social rented sector.

Support for Disabled private renters

National Government and the GLA should work together to provide security of tenancy to Disabled private renters and protect them from spiralling rent costs.

National Government should:

- regulate rents in the private rented sector
- abolish section 21 'no-fault' evictions
- introduce a legal duty on private landlords to consent to adaptations
- strengthen the provisions of the Equality Act 2010 and review Disabled Facilities Grants to ensure private renters can easily access adaptations they need.

The GLA should:

- set up a London Rent Commission made up of private renters, including Disabled renters, and other experts, tasked with assessing and designing how a system of rent control could work in London
- set up a London-wide register of wheelchair accessible homes across all tenures to enable wheelchair users to find suitable accommodation.

Organisational culture

The GLA and councils should meaningfully engage with Deaf and Disabled people and Deaf and Disabled People’s Organisations and co-produce housing policies with them.

- All Housing and Land Team, London Plan Team, and local authorities’ planning and housing teams should receive Disability Equality Training based on the social model of disability, delivered by Deaf and Disabled People’s Organisations. The training should focus on the housing and planning context.
- The GLA should co-produce the Mayor’s Housing Strategy and all London Plan Policies with Deaf and Disabled people and organisations that represent them.
- Councils should meaningfully engage with Deaf and Disabled people and their organisations in their local areas, strengthening their voices in the planning process and co-producing their local housing strategies with them.

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DISABLED
PEOPLE
LOCKED OUT
OF
HOUSING

