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

Inclusion
London

Barriers at Home





Barriers at Home Inclusion London

Acknowledgements

This report could not have been written without the contributions of Deaf and Disabled Londoners. We are extremely grateful for the time they have all given in contributing to this work.

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Ethics and data protection

Informed prior consent was collected from all local authorities and Deaf and Disabled people we interviewed as part of this research. Consent to use and retain data was also requested in our online survey targeted at Deaf and Disabled individuals. All data was anonymised during the transcription/ data processing stages, and no identifiable information is presented in this reporting. Where quotes and local case studies are provided, interviewees gave permission for this during interviews. Names of planning and housing officers of local authorities have not been provided throughout the report to guarantee anonymity. In some case studies we kept the real names of Deaf and Disabled individuals, while in others pseudonyms have been used to guarantee anonymity.

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Foreword

Everybody should have a decent, safe, affordable, secure and accessible home they can live in for as long they want or need. Homes are the foundation of our lives, the cornerstone of independent living. As the foundations of our lives, our homes are essential to our physical health, mental health and well-being.

Yet, the housing system is consistently failing Deaf and Disabled people who need accessible and affordable homes to be able to live full and independent lives. Many of us do not currently live in homes that provide us with a solid foundation because there are not enough accessible and affordable homes to meet our needs. But it doesn't have to be this way. Indeed, it cannot continue to be this way. Disabled people deserve full equality and justice and, to achieve this, it is paramount we remove the barriers they face in housing.

In England there are 9.8 million Disabled people, of which 1.6 million people are in London.¹ We are not a homogenous group: we have different impairments, have different genders and sexual orientations, come from different backgrounds, and live different lives. Some of us experience greater injustice, but we all want to live in fully accessible and genuinely affordable homes, connected to our family, friends and community.

Living in a home that meets our needs should not be a postcode lottery. Yet, demand for accessible homes across all tenures far outstrips supply in London and the shortage of accessible housing is particularly acute in social rented housing which Deaf and Disabled Londoners need because it is the most affordable and secure form of tenure.

Increasing the supply of accessible affordable homes is not just morally right. Accessible and affordable homes save money and lives. Investing in accessible housing means massively improving our physical and mental health. It means enabling us to work. It also means putting less pressure on the social care system and NHS resources.

This new report shines a light on the housing accessibility and affordability barriers Deaf and Disabled Londoners experience on a daily basis. It also highlights gaps in data and limitations of existing policies and practices in supporting the delivery of accessible social rent homes.

Throughout this research, we heard a few stories from Disabled people where accessible housing has radically transformed their lives. However, these were the minority. Most of the housing experiences we captured in this report reveal a stark and dire reality: too many people are living in extremely unsuitable conditions which severely impact their physical and mental health and prevent them from living independently.

This report is the first comprehensive research into key barriers to accessible and affordable housing for Disabled people in London produced by a Deaf & Disabled person's organisation – DDPO. It not only documents the housing barriers we face but also what needs to change. The findings and recommendations in this report are a call to action for national and London decision-makers to make accessible social rent housing a priority. Decision-makers have a huge responsibility to listen to our concerns and our policy solutions.

The founding principle of the disability rights movement is "Nothing about us without us". This is the belief that Disabled people, and our organisations, should be fully involved in decisions and issues that affect us. Decision-makers must listen and act to remove the structural barriers we face in housing but, for meaningful change to happen, it is crucial our lived experience and expertise is recognised and valued. It is essential that our voices are heard in housing and planning and that all housing policies and strategies are co-produced with Disabled people and our organisations.

There is no time to waste.

**Tracey Lazard,
CEO, Inclusion London**



Executive summary

This research set out to explore the housing conditions 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 in London.

We explored the barriers to accessible and affordable housing that Deaf and Disabled people experience in London and the impact these barriers have on their daily lives, capturing the individual stories of people with different kinds of impairments living across various tenures (such as private rented, social rented and owner-occupied homes).

We examined the data that local authorities and the Greater London Authority (GLA) rely on to plan and deliver accessible homes and investigated the barriers local authorities face in building accessible and affordable homes.

We also evaluated the adequacy and effectiveness of London Plan's policies and existing funding programmes at increasing the supply of genuinely affordable accessible homes in the capital.

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.

Key findings

1 Deaf and Disabled Londoners' housing needs

Many Deaf and Disabled Londoners across all tenures reported living in unsafe, inaccessible and unaffordable homes. We found that 1 in 3 survey respondents had to cut back on food and/or other essentials to afford housing costs. Also, we asked Deaf and Disabled people if their current home was accessible. Of those who responded, 1 in 4 told us they live in completely inaccessible homes, where they cannot safely and easily use basic facilities like kitchens, bathrooms, and entryways.

Accessible housing, however, goes beyond provisions for people with mobility impairments. It is also about ensuring other inclusive design features, such as adjustable lighting, noise-reducing insulation, thermal comfort and wayfinding layouts, are present in the home. Availability of support services, essential infrastructure and networks outside the home, such as accessible transport, are equally as important to Disabled people to live full and independent lives. **The planning and delivery of accessible housing should therefore be considered in the context of the wider built environment.**

Living in inaccessible homes has a detrimental impact on Disabled people's physical and mental health, leading to isolation and compromising people's ability to live independently. Living in homes that are also unaffordable and insecure further compounds the negative effects of inaccessibility, contributing to a significant deterioration in people's well-being. **Therefore, tackling accessibility and affordability barriers is essential for reducing health inequalities.**

Deaf and Disabled Londoners need accessible homes that are secure and affordable. The vast majority of people we interviewed told us social housing is their preferred tenure and that they cannot afford intermediate products, such as shared ownership. However, ties between housing security, affordability and accessibility are mostly overlooked by London decision-makers.

2 Limitations in data collection and gaps in monitoring processes

Local authorities

Most local planning authorities in London do not develop local plans that are fit for purpose because they rely on a weak evidence base. We found they lack accurate data on Deaf and Disabled people's current and future housing requirements. They also lack data on the accessibility of their housing stock. In particular, most councils do not collect and monitor data on accessible homes being built in their areas alongside tenure, despite the significant need for accessible social rent housing. Only 2 local authorities in London were able to provide us with the data on how many new accessible and wheelchair accessible homes are built across different tenures.

Moreover, 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. **This scarcity of data and lack of cross-team coordination undermines planners' ability to plan and build the homes Deaf and Disabled Londoners need.**

The GLA

The GLA's evidence base for assessing current and future Deaf and Disabled people's housing needs is also not sufficiently robust. The GLA does not accurately capture unmet need for accessible affordable housing in London and does not estimate the demand for accessible and wheelchair accessible homes across tenures. In particular, it does not collect and monitor data on approvals and completions of new build accessible homes by tenure. This is despite the shortage of accessible and wheelchair accessible homes being particularly acute in the social rented sector. **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.**

3 Inadequacy of planning policies in delivering accessible social rent homes

The planning policies and practices of the GLA and local authorities in London are not adequate to support the delivery of accessible social rent housing.

The London Plan sets ambitious accessible housing targets. However, these are consistently not being met by local authorities. While the compliance with existing accessible housing targets has dropped dramatically in the last 6 years, the GLA has not yet provided any explanation or analysis as to why the targets are not being met.

We found that building fully wheelchair accessible homes is more cost-effective and beneficial to wheelchair users than building wheelchair adaptable homes. However, 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. **Therefore, it is not possible to monitor if and where fully wheelchair accessible homes are being built in London.**

Our evidence also suggested that there is a disconnect between affordable and accessible housing policies and targets in the London Plan and local authorities' development plans. The GLA and most London boroughs do not set specific targets for affordable accessible new build homes. This is despite the number of Disabled Londoners languishing on social housing waiting lists being currently very high.

We found that, while social rent is one of the Mayor's preferred affordable housing tenures in the London Plan, it is not the sole priority. Making social rent a priority tenure 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.

4 Barriers to the delivery of accessible social rent homes

Local authorities in London are not accurately delivering the accessible and wheelchair accessible homes Deaf and Disabled Londoners need, as result of barriers in the planning system, such as viability assessments, gaps in data collection and monitoring practices as well as insufficient funding under the Affordable Homes Programme (AHP).

Some local authorities' planning departments also told us they lack the expertise and the capacity to properly analyse and challenge viability appraisals, which are often used by developers to reduce the number of accessible and affordable homes they have to build. 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.

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5

Insufficiency of funding to boost the supply of accessible social rent homes

Funding under the current AHP is directed towards supporting providers with the costs of building different types of “affordable” homes for rent and for sale. We found that the GLA is unlikely to deliver the social rent homes on the scale required to address the backlog of unmet demand for social housing unless AHP funding is heavily skewed towards social rent.

Also, grant funding under the AHP is unlikely to be sufficient to support the delivery of new build accessible social rented homes in London, particularly of wheelchair accessible homes, because they require more land and therefore cost more to build.

We also found that the GLA’s Council Acquisitions Programme (CHAP) has many benefits, but it is not currently conducive to addressing the shortage of accessible social rent housing in the capital. It is unlikely that funding conditions and grant rates set by the GLA for acquisitions of existing homes 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.

6

Organisational culture

Many of the challenges Deaf and Disabled Londoners face in housing exist because planning and housing policies are developed without meaningful engagement with Deaf and Disabled Londoners and DDPOs. There is a specific need to actively engage Deaf and Disabled people in shaping housing policies from the outset, moving away from consultation mechanisms towards genuine co-production engagement models.

Recommendations

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.



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. With this research, we 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 grassroots, user-led organisation run by and for Deaf and Disabled People.

We believe in the social model of disability that says that people with impairments are disabled by the way society is run and organised. While we might have health conditions or impairments, it is attitudinal, physical, institutional, communication and other structural barriers that prevent us from participating in society and living independently. The social model of disability tells us that, to achieve full equality and justice for Disabled people, we need to remove the barriers Disabled people face in society rather than making people fit society. We also believe in a cultural model of Deafness that celebrates Deaf people's linguistic culture and language.

What do we mean by Disabled People?

Our definition of Disabled people goes beyond the one included in the Equality Act 2010 which considers someone to 'have a disability' if they have a longstanding illness, disability or impairment which causes substantial difficulty with day-to-day activities. There are many people who identify as

Disabled but are not captured by this definition, such as people with long-standing impairments or conditions that do not currently affect their day-to-day activities.

We use the term Disabled people to cover all groups of people with impairment including: people with learning difficulties, people who experience mental distress, Deaf people, people with visual impairments, people with hearing impairments, people who are neurodivergent, people with long term health conditions, people with invisible impairments and people with physical impairments.

We recognise and respect that some of the groups in our definition do not think of themselves as being Disabled but we believe we are united by the disabling barriers we face in a disablist society.

Inclusion London Housing Project

As part of our Housing Project, we facilitate a Housing Network which 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, all working to improve the lives of people living in social housing and the private rented sector.

The focus area of this report 'The Supply of Accessible Housing' was selected as a priority research area by Inclusion London's Housing Network in 2022.

What do we mean by the supply of accessible housing?

An accessible home contains all of the necessary features to enable the person living there to move around safely and easily, use all of its facilities and enter and exit the home freely. This includes features which might make the home accessible for someone with a mobility impairment, but also for people with non-physical impairment types. Therefore, specific features might include ramped entrances, level access showers, stair lifts, and spacious rooms to accommodate mobility equipment. Accessibility can also extend to non-mobility-related features, such as noise-reducing insulation, flashing doorbells, temperature regulation and adjustable lighting.

Accessibility should also be considered in the context of the wider built environment. This includes access to the immediate proximity of a house and as well as shops, transport, healthcare services and amenities.

By 'The Supply of Accessible Housing,' we refer to homes that are designed and built to be accessible from the outset.

Literature review summary

What do we know about the state of accessible housing in London?

Nationally, there is a significant unmet accessible housing need for Disabled people across all tenures. **Around 1.8 million households in England have an identified need for accessible housing, of whom 580,000 are working age.**² The existing housing stock across England is often not accessible or adapted to meet Disabled people's requirements, **with only 9% offering minimal accessibility features.**³ **The shortage of wheelchair accessible housing is particularly acute, with 400,000 wheelchair users currently living unsuitable homes.**⁴

Building Regulations in England have produced homes that are generally inaccessible. All new homes need to be built to M4(1) visitable standards – the lowest housing accessibility standard – while M4(2) accessible and adaptable standards and M4(3) wheelchair user standards continue to be optional standards.⁵

Compared to the rest of England, in London there are higher housing accessibility standards in place that need to be adhered to when building new homes. The GLA's London Plan prescribes that 90% of new homes have to be built to M4(2) accessible and adaptable standards, while the remaining 10% of homes have to meet M4(3) wheelchair user standards.⁶ Despite this, a GLA analysis of ONS data in 2023 did reveal that households in London where at least one family member is a wheelchair user are more likely to be dissatisfied with their accommodation than wheelchair users in the rest of England.⁷

Also, whilst there are higher accessibility standards for new build homes **in London, only 3% of existing homes can be considered visitable.**⁸ Additionally, the latest Strategic Housing Market Assessment completed by the GLA reveals that **there are 200,000 households in London that include a Disabled person who need adaptations for their home to be accessible.**⁹

Overall, there is a critical lack of data on the housing needs and lived experiences of Deaf and Disabled Londoners, as well as the accessibility of the current housing stock. This gap makes it difficult to fully evaluate whether London's housing supply is meeting the needs of this population. As a result, it is unclear whether local authorities and the Greater London Authority (GLA) are accurately planning and delivering the accessible homes that Deaf and Disabled Londoners require. However, the GLA's own data monitoring reveals that London local authorities are not meeting the accessible housing targets set in the London Plan, suggesting that there are barriers hindering the supply of accessible housing.¹⁰

Our research sought to explore these barriers, what specific accessibility challenges Deaf and Disabled Londoners face and how they impact their lives. We also aimed to assess the actions taken by local authorities and the Greater London Authority to support the delivery of accessible housing.

What do we know about Disabled people's housing need and preferred housing tenure in London?

Historically, Deaf and Disabled people have been overwhelmingly represented in social housing. This remains true today, with **31% of Disabled Londoners living in social housing in 2020/21, compared to only 10% of non-Disabled Londoners.**¹¹ However, the progressive loss of social rent housing in London over the last decades has forced many Deaf and Disabled Londoners who cannot afford to buy their own home to live in the private rented sector.

Disabled people in London typically face a greater housing affordability challenge than non-Disabled people due to lower-than-average incomes and higher housing costs. According to Trust for London, **30% of families in London that include a Disabled person are in poverty,** compared to 22% of those that don't.¹² Additionally, analysis from the Office for National Statistics found that **53% of Disabled Londoners with a mortgage or renting**

reported difficulties in paying their housing costs—the highest rate of any region, compared to 44% of non-Disabled Londoners.¹³

For Disabled people, housing comes with additional costs that non-Disabled people do not face. Scope's latest Disability Price Tag report highlights that Disabled households spend more of their overall income on essential household costs such as energy, water, rent or mortgage payments, appliances, and household maintenance.¹⁴ Higher spending on utilities like fuel and water is crucial for many Disabled people to manage their impairments. Without doing so, they can experience significant increased pain, an inability to maintain hygiene and a loss of social connectivity and reduced quality of life.

The shortage of genuinely affordable housing is particularly acute, disproportionately impacting Disabled people. The latest local authority housing statistics collected by the Department for Housing show that **23,397 individuals in London on the social housing waiting list in 2022/23 were people who needed to move on medical or welfare grounds, including grounds relating to an impairment.**¹⁵ This highlights the urgent need for accessible social housing in the city.

Living in homes that are not only inaccessible but also unaffordable and insecure compounds the negative effects of inaccessibility, contributing to a significant deterioration in people's well-being. For this reason, accessibility and affordability cannot be separated when discussing housing for Disabled people.

Our research set out to explore the housing affordability barriers Deaf and Disabled Londoners across different tenures face in parallel with accessibility issues and the impact these have on their lives. We also investigated the extent to which the policies and practices of local authorities, the GLA and national Government as well as funding available under the Affordable Homes Programme (AHP) are supporting the delivery of accessible social rent housing.

Value of this research

- Most research on accessible housing has been carried out by organisations which are not Deaf and Disabled People's Organisations. This study has instead been conducted by a grassroots, user-led organisation, run by and for Disabled people. As the capital's only pan-London DDPO providing capacity building support to the DDPO sector, our position and our work gives us a unique reach and insight into the experiences, needs, views and aspirations of London's Disabled communities and our organisations and we are committed to sharing this knowledge with the wider community and decision-makers.
 - Our research is focused specifically on the housing experiences of Deaf and Disabled Londoners, addressing a significant gap, as most research has been conducted on a national scale. Our work includes qualitative research on accessible housing in London and its impact, as well as research on local authorities' insights and data, alongside GLA's data and policies.
 - Our research takes a broader view of accessible housing, extending beyond the needs of people with mobility impairments and wheelchair users. While much of the existing research has focused on wheelchair users, there has been little research on the housing needs of neurodivergent people, autistic people, those with learning difficulties, sensory impairments, and blind and partially sighted people in general needs housing.
 - We examine the link between accessible and affordable housing and the impact that both elements have on Disabled people's quality of life and independent living. Unlike most research, which typically focuses on either accessibility or affordability, we explore how both factors intersect to shape Disabled people's lives.
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Research aims

Our research aimed to:

1. **Identify the main accessibility issues** Deaf and Disabled Londoners experience in their homes.
 2. **Understand the impact** of living in unaffordable and inaccessible homes for Deaf and Disabled people in London.
 3. **Examine the evidence base** local authorities rely on to plan and build homes for Deaf and Disabled people in their areas, including data on Disabled people's housing requirements and accessibility of the existing housing stock.
 4. **Explore the barriers** local authorities face when attempting to build affordable and accessible homes.
 5. **Investigate the effectiveness** of London Plan policies on accessible and affordable housing set by the GLA as well as existing funding programmes in supporting the delivery of accessible affordable homes in London.
-

2. Research methodology



Photo: Simon Lamrock

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 the 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 Strategic Housing Market Assessments (SHMA)

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.

2. Interviews with Deaf and Disabled Londoners

We carried out qualitative interviews with 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.

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.

Data collection methodology

Evidence collection	Methodology
Literature review	Review of existing research and data sets related to disability and housing
Greater London Authority Data analysis	Analysis of the GLA Planning Datahub and London Plan Annual Monitoring reports regarding completions and approvals of new build accessible and affordable homes, the London Strategic Housing Market Assessment (SHMA), London Plan policies on accessible and affordable housing as well as Affordable Homes Programme (AHP) funding guidance 2021-2026.
Local Plans and Strategic Housing Market Assessments (SHMAs) Analysis	Analysis of all London Local Plans and Strategic Housing Market Assessments
Survey with Disabled people	Online survey available in British Sign Language and Easy read aimed at Deaf and Disabled Londoners to understand their housing experiences Response rate: 84 people
Interviews with Disabled people	In-depth qualitative interviews with 22 Deaf and Disabled people to understand their housing experiences
Freedom of Information Requests (FOI)	FOI's submitted to 33 London local authorities Response rate: 31 local authorities
Interviews with local authorities	Interviews with staff members of London local authority planning and housing teams Response rates: 6 local authorities

Survey

At the end of 2023, we launched a Housing and Disability survey to ask Deaf and Disabled Londoners about their housing experiences. The survey aimed to gather a variety of responses from individuals across different London boroughs and tenures, and focused on the following areas:

- **Accessibility.** We investigated whether people’s current homes are accessible, and what accessibility requirements people require for a home to be accessible to them.
- **Accessibility of the local area.** We researched whether people consider their local area to be accessible to them and what factors make it accessible or inaccessible.
- **Tenure.** We examined what tenure people live in, asking them whether they rent from the council, housing association or private landlord, and whether they live in supported housing or own their own home. We also looked to understand whether they are satisfied with their current tenure or would prefer to live in a different tenure.
- **Affordability.** We investigated whether people find their current home to be affordable and whether they had to cut back on anything to afford their housing costs.

Response rates

In total, we had 84 respondents to the Housing and Disability survey who represent a small but diverse portion of London’s population. These respondents were self-selected: we advertised the survey to our network of Deaf and Disabled People Organisations and on social media.

The sample size of 84 is not representative of London as a whole, and therefore cannot be considered statistically significant. As a result, the findings should not be considered definitive of the housing experiences of all Deaf and Disabled Londoners.

Despite the limitations outlined above, the findings of the survey can show us potential trends and patterns in the housing experiences of

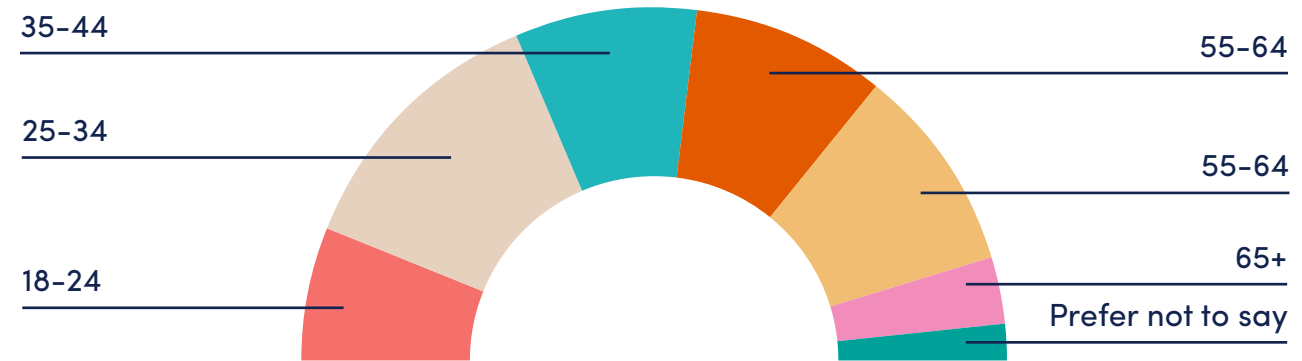
Deaf and Disabled Londoners. The survey results can indicate emerging themes, issues, and common experiences of Deaf and Disabled Londoners. Therefore, the benefit of this research, and its analysis, is to highlight where there may be a need for further research into certain specific aspects of the housing experiences of Deaf and Disabled Londoners.

The way the data is presented in this report reflects the sample size that was collected. There are graphs, raw numbers and ratios to present trends that can be found in the data. We have not used percentages or made definitive claims about the entire Deaf and Disabled population of London. We have made sure to provide context and acknowledge the limitations of the data where necessary.

Demographics

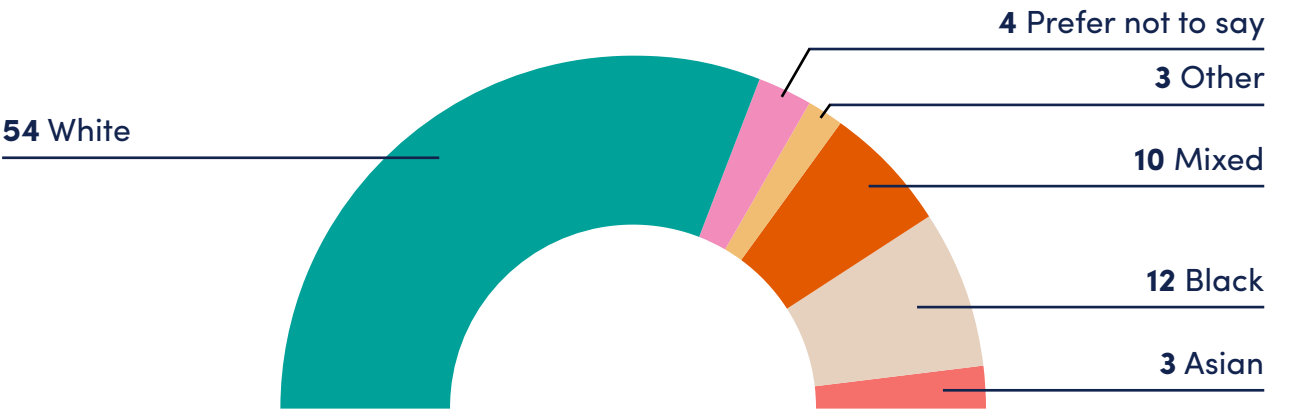
Age

The most common response rate came from individuals who are 25–34. Only 5 respondents were over 65.



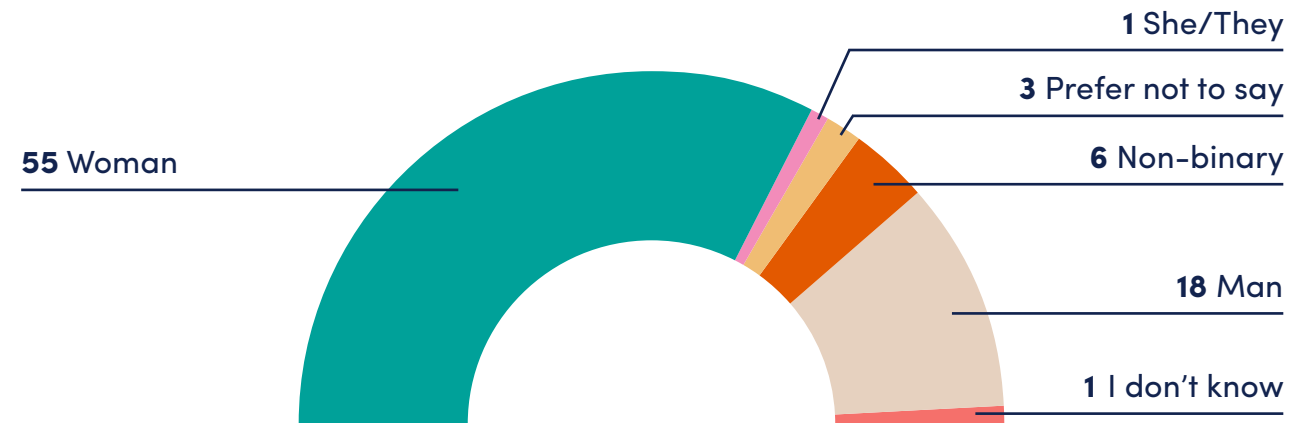
Race

Of the 84 survey respondents, 54 identified as white, reflecting the general population proportion of London. Twelve respondents identified as Black, which is also in line with city demographics. However, Asian people are underrepresented, with only 3 respondents compared to 15.6% of London’s population.¹⁶



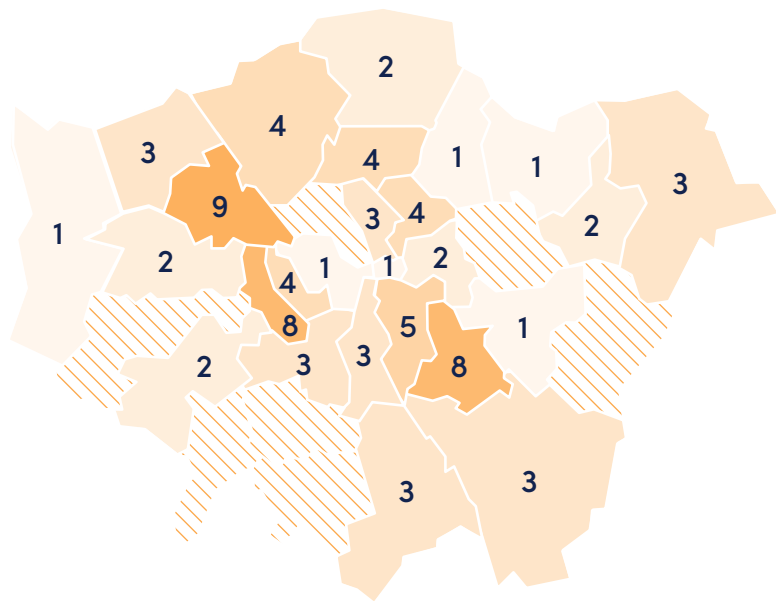
Gender

- Women are significantly overrepresented in our sample compared to London’s nearly equal split between men and women (2021 Census).¹⁷
- We asked participants for their gender identity rather than sex so they could select their identity rather than their sex assigned at birth.
- Additionally, 5 out of 84 respondents identified as transgender, which is higher than the 0.9% reported in the 2021 Census data.¹⁸

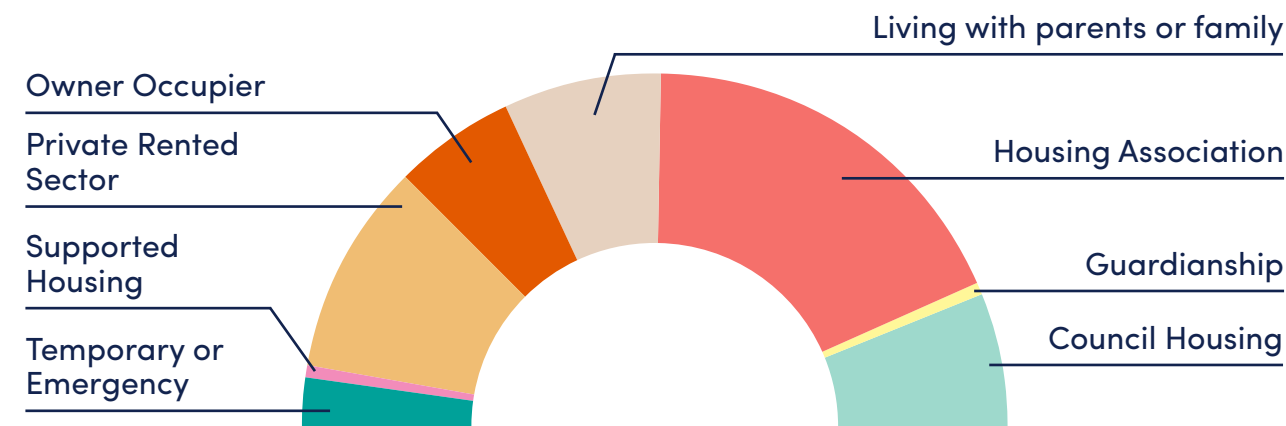


Areas of London

The most common borough respondents came from was Brent with a total of 9 responses, followed by Hammersmith and Fulham and Lewisham, who had 8 responses each. We did not get any respondents from: Bexley, Camden, Kingston upon Thames, Merton, Newham, Sutton.



Tenure type



Disabled people are significantly more likely to live in social housing than non-disabled people. In London, ONS data (2020/21) shows that 31.3% of Disabled Londoners lived in social housing compared to 10.3% of non-disabled people.¹⁹

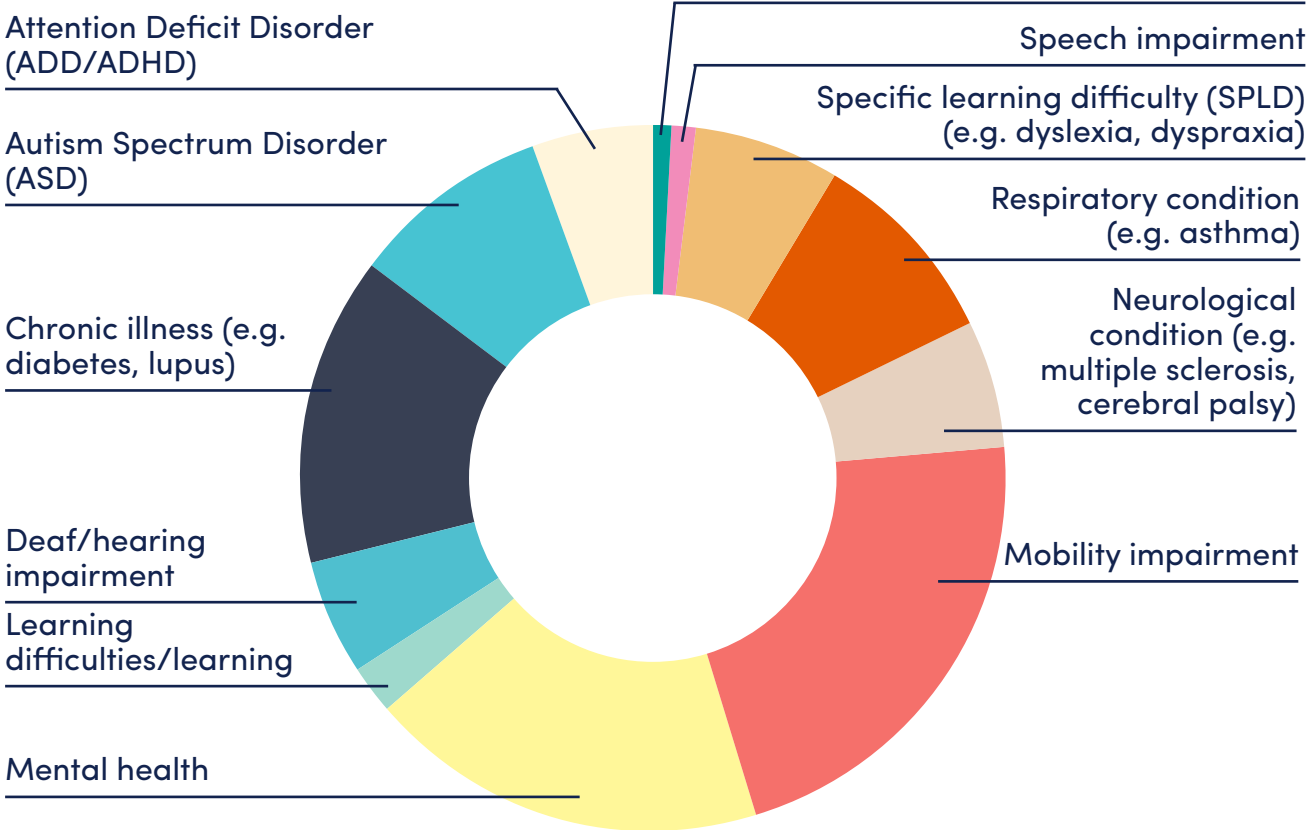
In our sample, nearly half of all respondents lived in social housing (40/84). Whilst this is reflective of social housing being the most common tenure type of Disabled people, Disabled social housing tenants are overrepresented in our sample.

In London about 1 in 5 Disabled Londoners live in the private rented sector, which is reflective of 1 in 5 of our overall sample being private renters.²⁰

29.4% of Disabled Londoners are owner occupiers which means that, with only 9/84 respondents being owner occupiers, they are underrepresented in this sample.²¹

The proportion of people living with their parents in our dataset is broadly similar to the general population in London.

Impairment type



The most common impairment type that was selected was 'mobility impairment' with almost half of all respondents selecting this option.

The second most common was 'mental health', however it is notable that only 3 respondents selected 'mental health' as their only impairment type, the majority selected 'mental health' alongside other impairments.

In fact, a significant number of respondents selected more than one impairment. This is reflective of the complex needs of individuals. It also means that we have not directly compared the accessibility requirements of different impairment types, as many of them are overlapping.

Interviews

Interviews with local authorities

To understand the barriers local authorities face in planning and delivering accessible affordable homes, we contacted a range of professionals within planning and housing teams. These included planners, housing officers, housing Occupational Therapists (OTs) and inclusive design consultants. We arranged interviews with 6 councils.

In our interviews we asked the following questions:

- Do you think that your local authority faces any challenges in delivering accessible and adaptable housing for Disabled people? If yes, what are these challenges?
- What evidence do you use to predict need and demand for accessible and adaptable housing in your borough? We refer to data that you use to inform the development of your Local Plan, local housing strategy and Strategic Housing Market Assessment.
- Do you have data about the number of Disabled people in your area, the impairments they have and what housing accessibility needs they might have?
- Do you engage with Disabled people in your borough and/or Deaf and Disabled People's Organisations to inform the development of your local plan?
- How and how often do you engage with Disabled people in your borough to understand their housing needs?
- Do you know how many of the accessible homes built in your borough are affordable – intended for social rent?
- Do you think there are any barriers in meeting the accessible housing targets in your borough? If yes, what are they?
- Would you be able to state how many properties in your housing stock are accessible?

- Do you have an accessible housing register in your area?
- What do you think would help improve the delivery of accessible and adaptable housing in your borough?

Interviews with Deaf and Disabled Individuals

During the survey we asked respondents whether they would like to take part in a case study interview with us. We invited all 44 respondents who selected 'yes' to this question to a case study interview and conducted in-depth qualitative interviews with 22 of them.

We asked a series of questions aimed at understanding the impact of living in accessible or inaccessible accommodation on their lives. We categorised questions in 4 areas:

- **Accessibility.** We asked people living in inaccessible homes what an accessible home looked like for them and in what ways their life would be improved if they lived in an accessible home. We also investigated whether people had tried to make any adaptations to their homes to make them more suitable or tried to move from their current homes to somewhere more suitable.
- **Local area accessibility.** We asked people how living in accessible/inaccessible areas impacted on different aspects of their lives.
- **Tenure.** We looked to understand why people were satisfied or dissatisfied with their tenure and, if they preferred to live in a different tenure, why they would like to do so.
- **Affordability.** We researched the impact of living in affordable/unaffordable and secure/insecure accommodations on people's lives, enquiring about why they felt they could or could not afford their accommodation and why they felt they could live long-term in their home or not. We also asked people who had cut back on essentials or recreational activities to afford their housing costs, how this impacted their lives.
- **Changes.** We asked people what changes they would like to see in the housing system and what they would like decision-makers to

know about their experience of trying to get accessible and affordable housing.

As we spoke to a diverse range of individuals with different types of impairments living across various tenures, we gathered a wide variety of insights that enabled us to explore accessibility issues from multiple perspectives.

Analysis

To analyse the case studies and local authority interviews, we developed a set of pre-set codes, which consisted of themes we expected to find in the case study transcripts. We then also analysed emergent codes. These were themes that came up during the case study interviews that we did not predict beforehand.

Through coding the interviews, we were able to quantify how many of our interviewees mentioned a specific code and analyse what was said under each code to identify themes.

Photo: Medact



3. Housing accessibility barriers and their impact on Deaf and Disabled Londoners' lives



Introduction

Nationally, there is a significant unmet accessible housing need for Disabled people across all tenures.²² The shortage of wheelchair accessible housing is particularly dire, with 400,000 wheelchair users currently living in unsuitable homes.²³ Finding a fully accessible home across England is often a postcode lottery.

While the detrimental impact of living in an inaccessible home on Disabled people in England has been widely documented, the specific consequences of London's housing inaccessibility crisis on Deaf and Disabled Londoners have not been explored despite the policy context being very different in London. Compared to the rest of England, in fact, in London there are higher housing accessibility standards in place that need to be adhered to when building new homes. Also, unlike other areas in England, in London there is a set 10% target for the delivery of wheelchair user homes. Despite this, many wheelchair users in London are extremely dissatisfied with their accommodation.

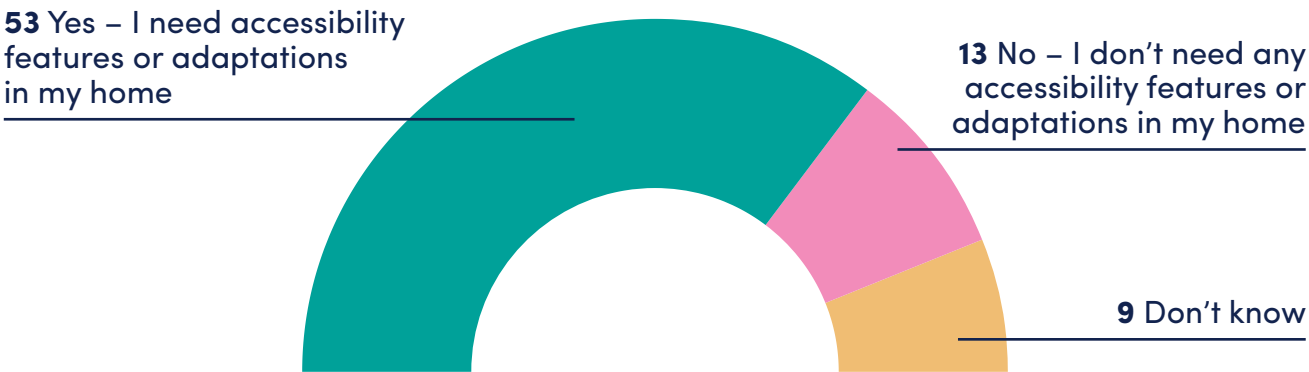
A 2023 GLA analysis of English Housing Survey found that households in London where at least one member uses a wheelchair, some or all of the time, are more likely to be dissatisfied with their accommodation than households where no one uses a wheelchair. London households with wheelchair users are 5 percentage points more likely to be dissatisfied with their housing than those in the rest of England, and they are 4 percentage points more likely to be dissatisfied than London households where nobody uses a wheelchair.²⁴

While wheelchair users' feeling of dissatisfaction with their accommodation might be driven by a variety of factors, we assume that the suitability of an accommodation, and therefore the accessibility level of one's home, does have at least some impact on wheelchair users' level of satisfaction with their housing. Based on this assumption, we would expect housing satisfaction rates among Disabled people in London not to be worse than national averages, at the very least, due to higher accessibility standards and targets for the delivery of wheelchair user homes being in place. Contrary to expectations, wheelchair users in London are significantly more dissatisfied with their housing.

We therefore set out to investigate the extent to which Disabled Londoners are living in suitable accommodation as well as the specific accessibility issues Deaf and Disabled people face in London and the impact this has on their lives. This chapter explores some of the most common accessibility issues Deaf and Disabled people encounter in their homes, including physical features that people need to move safely and easily and have full use of their facilities as well as non-physical features that cover sensory needs, such as lighting, noise and thermal comfort. It covers accessibility in various areas of the home, including kitchens, bathrooms, hallways, and other key spaces, as well as accessibility challenges related to entrances and the surrounding local area. We report an analysis of data collected through our Housing and Disability survey as well as qualitative insights from the case study interviews.

Accessibility needs

Do you need accessibility features to live in a home?



The above graph shows whether people need accessibility features to live in a home.

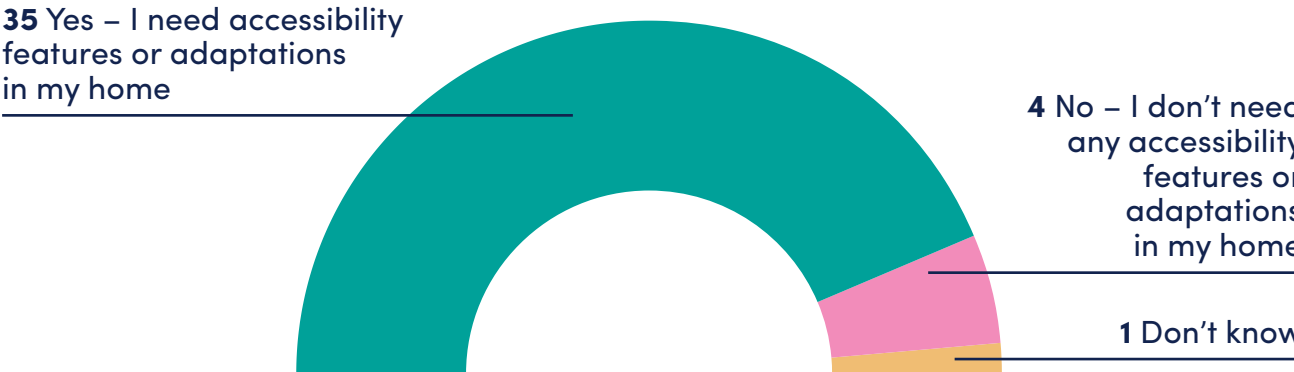
The majority of respondents (53 out of 84) indicated that they need accessibility features to live in a home. This trend was consistent across all tenures¹, highlighting the widespread need for accessible housing options among those who answered our survey.

¹ By tenure, we are referring to the type of housing someone lives in. The options given in the survey were: renting from the council, renting from a housing association, renting

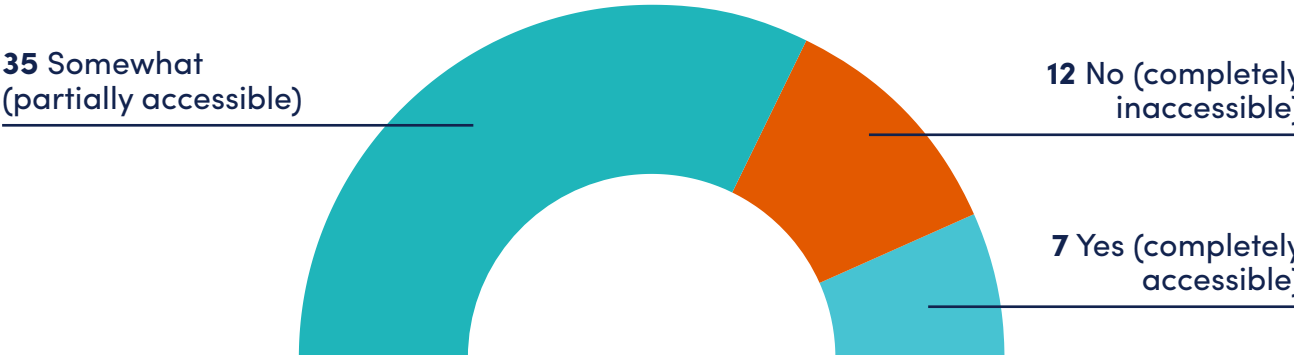
Interestingly, 9 respondents were unsure whether they needed accessibility features to live in a home. This may suggest a lack of awareness about the types of accessibility features available in homes that could improve day-to-day living.

Mobility impairments

An overwhelming majority of individuals with mobility impairments reported needing accessibility features to live in a home, a larger portion than the overall survey respondents.



Is your current home accessible to you?



privately, temporary accommodation, supported accommodation, living with parents/family, owning your own home.

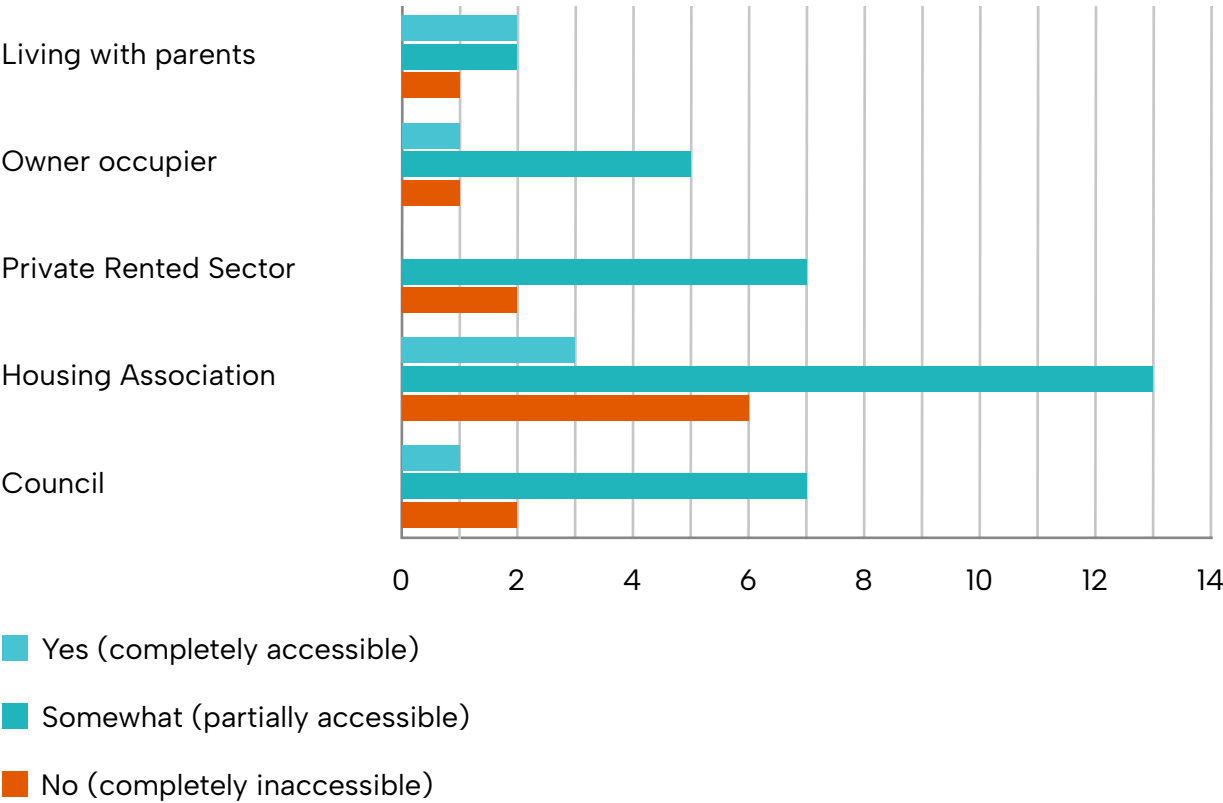
Most of the people who told us that they need accessibility features to live in a home said their current home is not accessible to them, with many experiencing partial accessibility at best.

Of the 54 respondents who said they needed accessibility features to live in a home, only 7 said their current home is completely accessible.

Most of the respondents to this question told us that their home is somewhat accessible (35 out of 54).

1 in every 4.5 respondents to this question told us that their home is completely inaccessible to them. This is significant, as a home being completely inaccessible could suggest these individuals are living in homes which substantially affect their quality of life, where they cannot use basic facilities or move around freely.

Tenure



The data presented in the graph highlights the extent to which respondents who need accessibility features to live in a home find their current home to be accessible, broken down by tenure type.

There were varying response rates for different tenure types. Therefore, direct comparison between tenure types is somewhat limited.

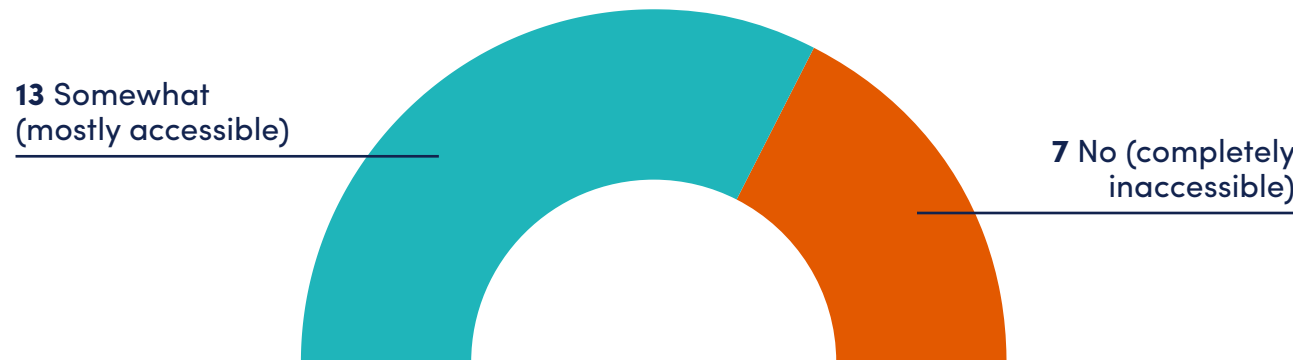
However, across all tenures, there are a significant number of respondents living in inaccessible homes, whether completely inaccessible or partially accessible.

Private rented sector

None of the respondents living in private rented homes told us that their current home is completely accessible. Our findings confirm previous research conducted by the Equality and Human Rights Commission in 2018 which has shown that across Britain, Disabled people living in the private rented sector are the most likely to be living in unsuitable accommodation.

This finding indicates a need for more research to be done into accessibility issues Disabled people face within the private rented sector.

Mental health



The above graph shows whether people with mental health support needs who need accessibility features reported that their current home met their access needs.



Photo: Age Without Limits

Notably, one of the respondents with experience of mental distress or trauma who needed accessibility features reported that their current home fully met their access needs.

It is important to note that most respondents who indicated that they have mental health support needs also selected that they had other impairment types. This means we cannot directly link mental health alone to their unmet accessibility needs.

Nonetheless, this finding remains significant as it highlights a broader issue: housing systems may not adequately address the complex accessibility requirements of individuals with multiple impairments, including mental health conditions.

Research conducted by Shelter (2017) revealed that GPs identified housing as a significant factor in worsening symptoms of existing mental health conditions, such as depression. The study highlighted that poor or unstable housing situations often exacerbated the mental health of individuals already experiencing these conditions.²⁵

Missing accessibility features

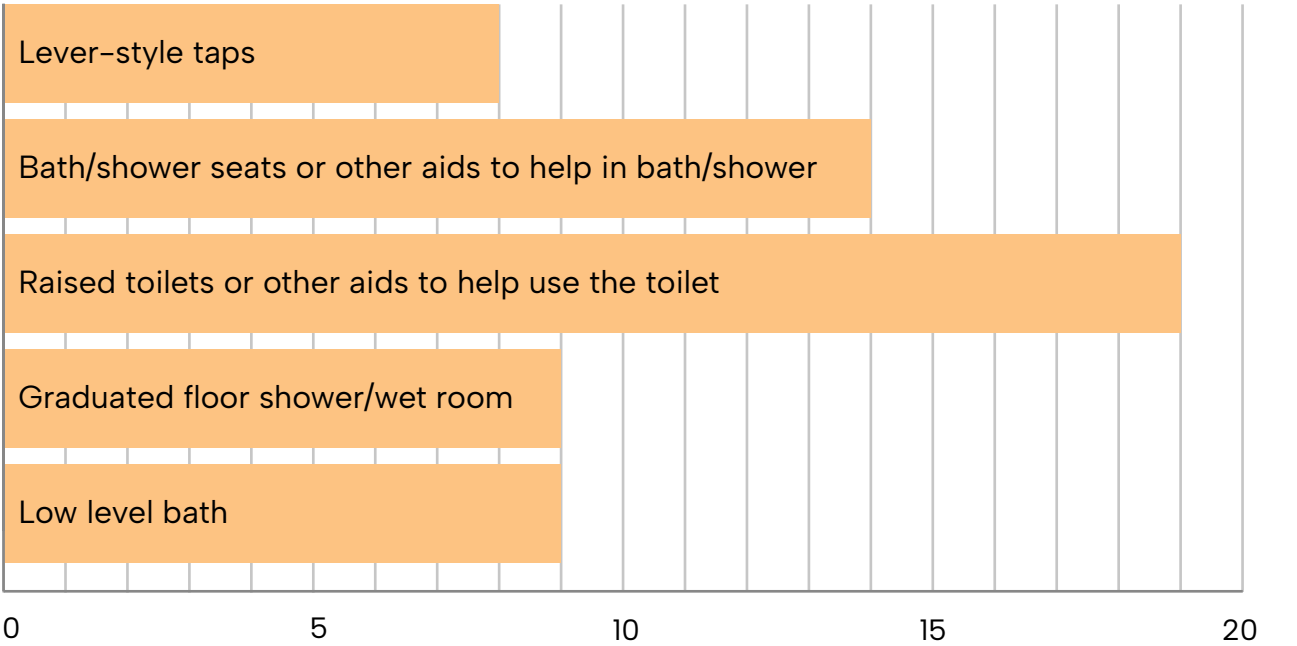
In the survey respondents were asked to identify which accessibility features they need but are missing from their current homes. These has been categorised into 4 main areas:

- **Kitchen/bathroom**
- **Other rooms** (including bedrooms, hallways, living rooms)
- **Outside of the home** (including entrance, parking)
- **Local area** (including transport network, health and social care support services, shopping facilities)

Kitchen/bathroom

Bathroom

Missing bathroom accessibility features



The graph displays the most common bathroom accessibility features that survey respondents indicated they need but are lacking in their homes.

The features most frequently reported as absent from the bathroom were raised toilets or other aids to help use the toilet.

- Nearly 1 in 4 respondents told us that their current home lacks the accessibility features they need to use the toilet.
- 1 in 6 respondents told us that their home lacks the necessary accessibility features for them to use the bath/shower.

Case study interviews

During the case study interviews, some individuals elaborated on the accessibility issues present in their bathrooms. Key issues mentioned included:

- Inaccessible bathroom entrance due to steps
- Missing grab rails for using the toilet or shower
- Absence of a wet room
- Lack of automatic taps
- Absence of a bath

Their responses highlighted that people with different impairments need bathroom adaptations that are personalised and tailored to their individual accessibility needs.

While mobility impairments were a significant reason for needing accessibility features, our findings indicated that it is not just people with mobility impairments who need accessible bathrooms, but people with a wide variety of impairments can necessitate accessibility features to use a bathroom.

One individual, Richard, who experiences mental distress, shared his concerns:

// I've asked if there is any chance of having taps that I don't actually have to touch because then I can just wash my hands and leave."

He further explained that at the moment,

// I touch the tap, then I start panicking, and I'm going backwards and forwards and I can be actually washing my hands for hours ... the state of my hands, they go white and they get really dry and they crack and they bleed."

Individuals told us that accessibility issues with their bathrooms not only meant they were less likely to wash themselves, but also presented serious health and safety risks.



Photo: Age Without Limits

CASE STUDY

Corinne – Health and Safety Bathroom

// I had a seizure once, and I woke up with water up to my chest in the bath and blood everywhere, because I banged my face on the tap."

Corinne is a social housing tenant who has epilepsy. The design of her previous bathroom, in the home she lived in for 14 years, was both inaccessible and dangerous.

"Obviously, if you have epilepsy, you can't have a bath, I was there 14 years with a bath." Corinne's bathroom only had a bathtub with a showerhead, which was extremely inaccessible. She once experienced a traumatic incident: **"I had a seizure once, and I woke up with water up to my chest in the bath and blood everywhere, because I banged my face on the tap"**.

Corinne described this as a **"really, really, really scary situation"** and emphasized that she had no support from her local council.

Corinne explained how the bathroom was not accessible for her:

"Every time I went to shower, I had a shower above the bath, but still, it is dangerous."

As a result, whilst living there, she told us **"I had to call my mother. Every time I went to shower"**. Her mother would check in occasionally, asking, **"Are you all right?"** to which Corinne would respond, **"Yes."**

Eventually Corinne was moved to another council property, where the local council offered her a wet room as an adaptation to improve accessibility. However, she expressed concerns about its safety. She stated, **"I don't need a wet room and actually for me it would be unsafe to have a wet room because if I'm in a shower and I have a seizure, I would need something to kind of prevent me from falling backwards completely and hitting my head on something."**

In the end, Corinne paid for her own adaptations to make her bathroom safe.

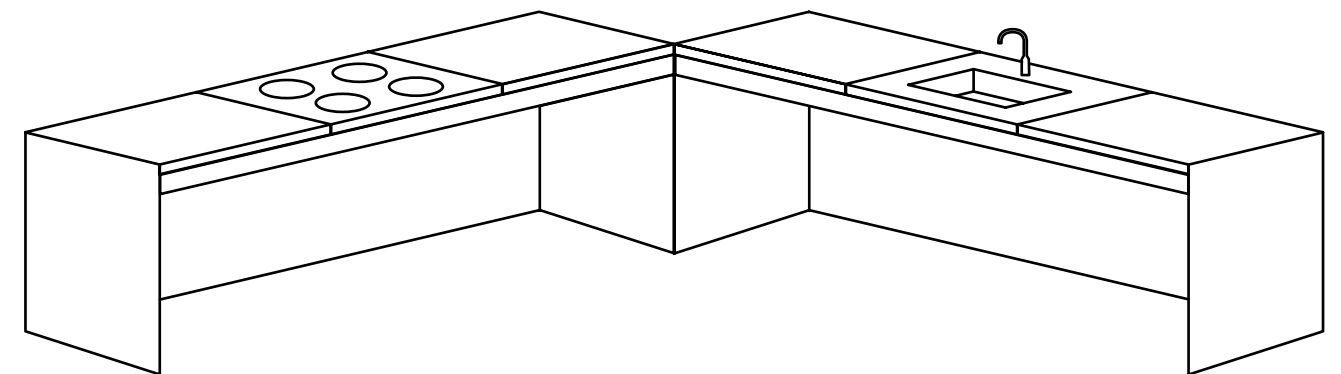
Kitchen

During the case study interviews, individuals regularly reported experiencing accessibility issues in the kitchens of their homes. These issues prevent people from being able to use their kitchens as they would like to, compromising their ability to easily carry out day-to-day tasks. They also create health and safety risks.

The main issues that were mentioned were:

- Entrance to the kitchen being inaccessible due to steps
- Lack of space under counters for wheelchair users
- Cupboards being out of reach for people with mobility impairments, or wheelchair users
- Kitchen equipment being inaccessible (e.g. toasters, kettles, ovens)

New build M4(3)b homes are wheelchair accessible homes which are built to have widened doorways and a clear, continuous open leg space beneath the kitchen worktop. These design elements would effectively eliminate many of the barriers Sam encounters, creating an accessible kitchen that allows for greater independence and ease in cooking.



CASE STUDY

Robert K Kitchen

Robert K, who has a visual impairment, lives in a privately rented property where he faces accessibility barriers in his kitchen.

The appliances he currently has pose serious risks, as he is unable to use them safely. He described the dangers associated with his kettle and toaster, stating, **“If it was adapted, it would be easier for me to avoid burning, scalding, those sorts of scenarios which frighten me.”** He elaborated on the toaster, explaining, **“You put your fingers in the red bars as it’s warming up and find your fingers are burnt.”**

Due to these accessibility issues, Robert K cannot use his kettle, toaster, or oven. Instead, he must go to a petrol station to buy coffee, saying, **“I’ve got to get my coat on, go down the road to the petrol station, get the coffee, and bring it back.”**

The Royal National Institute of the Blind (RNIB) has offered Robert K kitchen appliances specifically designed for individuals with visual impairments. However, his landlord has not allowed these adaptations.

“There are toasters and kettles which are adapted to people that are blind or have partial vision. Yeah, and they do require adaptations within the property.”

Despite the support from RNIB and other charities focused on disability and mental health, Robert K’s landlord’s refusal to allow this adaptation significantly limits his ability to use his kitchen safely and independently.

CASE STUDY

Sam Kitchen

Sam, a wheelchair user, lives in an owner-occupied home where they encounter significant barriers in their kitchen. One of the primary accessibility issues is the insufficient space under the kitchen sink and counters, which means they cannot use their wheelchair whilst cooking.

Additionally, the narrow doorframes pose another barrier: **“The house also has door frames that are really, really small. That means that I can’t really wheel myself from my hallway into my kitchen.”**

These physical barriers affect Sam’s ability to cook independently. They express, **“In terms of not being able to use my wheelchair whilst cooking, it means that I cook a lot less than I would otherwise like to. I rely a lot more on my partner and my housemate to do the cooking, or I’m like unable to eat sometimes if no one’s around.”**

Speaking of what a completely accessible kitchen would allow Sam to do, they said, **“I would actually be able to make choices based on what I wanted rather than what I felt I had to do or what my energy levels could manage I suppose.”**

“I could decide to cook even a really simple meal on a higher fatigue day if I could cook from my wheelchair because I had an accessible kitchen.”

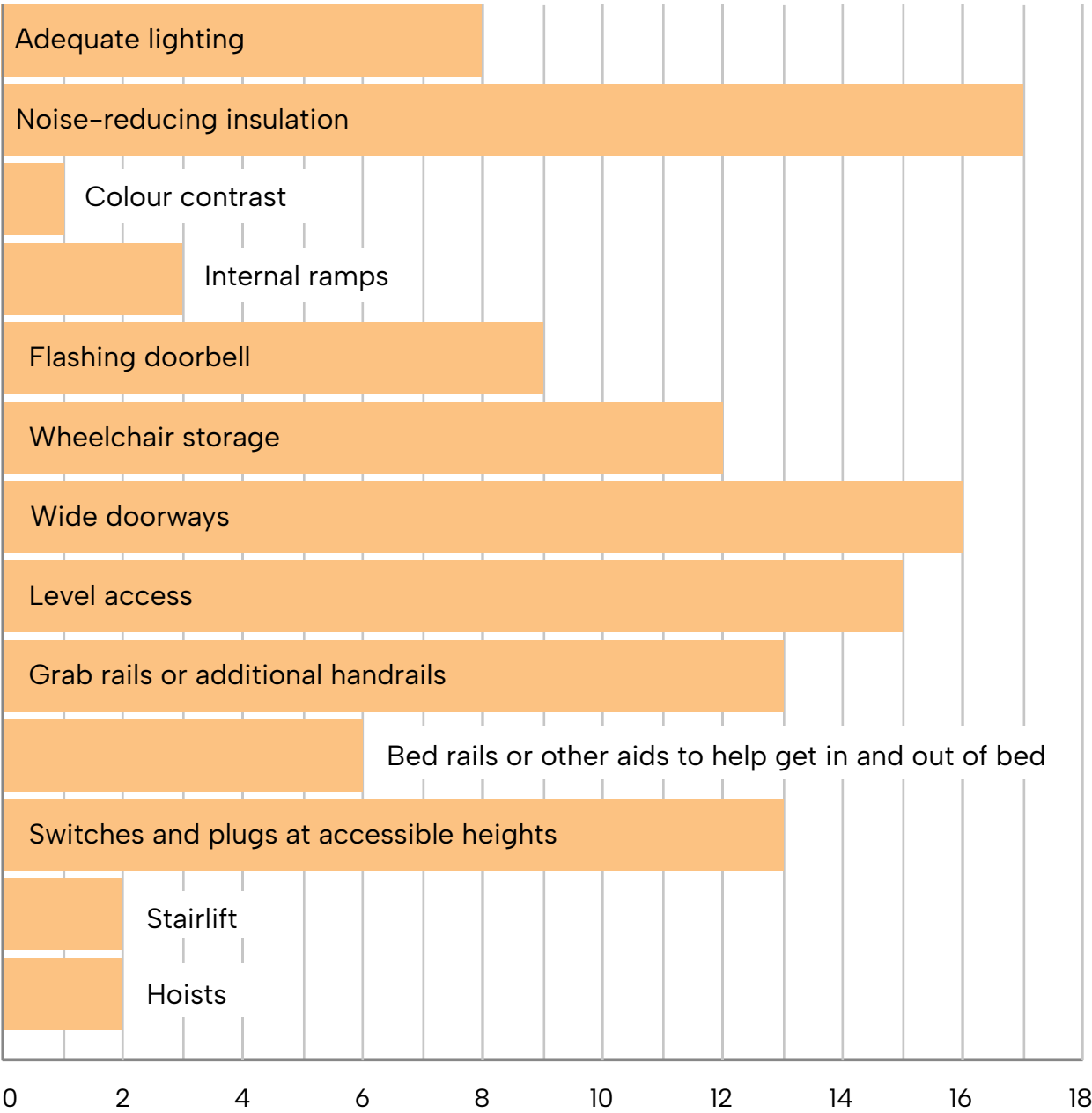


Photo: Disabled and Here

Other rooms

‘Other rooms’ refers to the accessibility of the hallway space, living room and bedrooms. Respondents reported a multitude of issues related to accessibility in these spaces.

Missing access features



The above graph shows how many individuals told us they are lacking certain accessibility features that you might find in a home, excluding outside of the home and kitchen/bathroom.

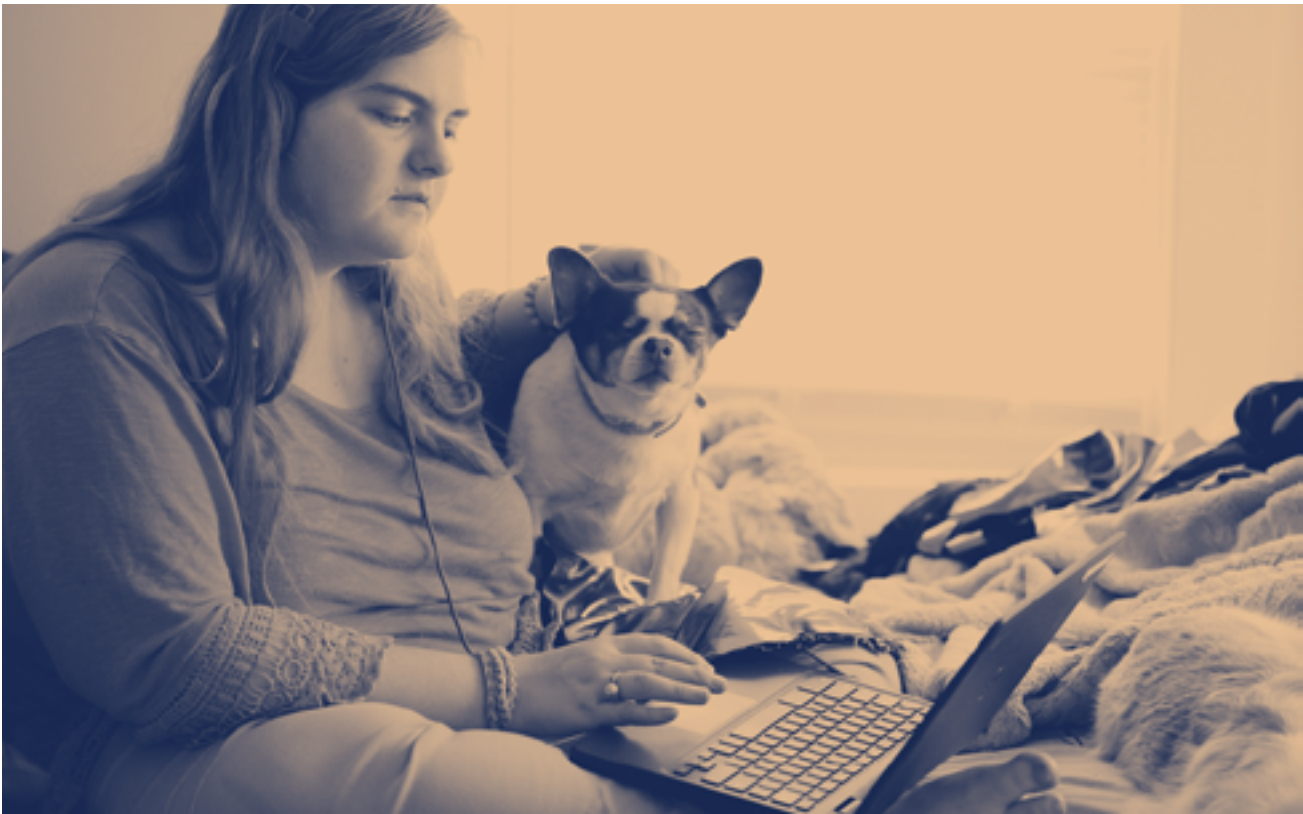


Photo: Alexander Grey

Noise

The most common accessibility requirement that survey respondents reported as being absent in their homes is noise-reducing insulation.

- 1 in 5 respondents reported that they need noise-reducing insulation, and it is not present in their current homes.
- Notably, all of the respondents who selected that they lack the noise-reducing insulation they need also selected that they have mental health support needs.

Case study interviews

Four of the case study interviewees shared that noise creates significant accessibility challenges for them. These individuals described how excessive or persistent noise, whether from the surrounding environment or neighbours, negatively impacts their ability to relax, concentrate, or manage their health.

CASE STUDY

Lizzie Noise

// It's disabling, I literally cannot concentrate on anything else or think about anything else."

Lizzie, who lives in a housing association property, has various impairment types. Due to her impairments, she experiences heightened sensitivity to noise.

"I get quite sensitive to things like noise, sometimes it just feels overwhelming. So, I have my noise-cancelling headphones that are really, really helpful.

"And sometimes I have to wear them all day because I understand it's London, it's loud, it's busy".

The area where Lizzie lives is very noisy, so she is unable to go into certain rooms in her house:

"And if there's construction going on, it's near enough to the house that I can hear it. I normally would not go upstairs on those days because our living room with the big window lets all of the sound in, and I can still hear it through my headphones, and it grates and grates and grates and grates on me, so I normally would keep away from that window.

"Yeah, there's a room in our house that's much quieter all the time, so I would normally stay in there."

Speaking of why noisy environments are inaccessible for her, Lizzie said, **"people wouldn't understand because for them it's like, oh, it's just a bit annoying, but no, it's like, it's disabling, I literally cannot concentrate on anything else or think about anything else."**

CASE STUDY

Andrew Noise

Andrew has various impairment types that cause him to be more sensitive to noise.

"Part of my fatigue is, as well as I'm tired, I'm extra-sensitive to sensory information. That could be touch, but it could also be sound."

Speaking about the impact of noise on his health, Andrew said:

"So actually, this stress really affects my health, it affects my mental health. But it can also lead to full-on sort of medical episodes.

"So, I've got noise cancelling headphones because of all these issues and, even then, it still doesn't help it sometimes."


He plans to ask for soundproofing as part of his Disabled Facilities Grant. These are grants which allow Disabled people to adapt their homes to make them more accessible.

"So for me that sort of soundproofing aspect is one of the things I'm asking about with the Disabled Facilities Grant, I think they'll say no."

Lighting

Issues with lighting also were prevalent in both the case study interviews and the survey responses. In the survey, 8 people mentioned that they do not have adequate lighting in their homes.

Case study interviews



A quarter of case study interviewees mentioned that lighting was an accessibility issue within their home.


During the case study interviews, the accessibility of lights within people’s homes was frequently mentioned. The reasons why lighting was inaccessible varied among participants, but 3 main issues emerged.

1. Insufficient lighting for visibility

Poor lighting conditions, particularly at night, make it difficult for individuals with certain impairments, including visual impairments, to see clearly within their homes. This lack of proper lighting increases anxiety around their surroundings and creates practical challenges for navigating their living spaces.

2. Health impact

Several interviewees shared that certain types of bright lighting trigger migraines and headaches. Individuals described how even brief exposure to the intense lighting in their living spaces can trigger symptoms, making it difficult to function comfortably in their own homes.



The lighting currently is either far too bright or it’s in the wrong place or it doesn’t have a dimmer switch. So, when I walk in every night, I have a headache. That light just drills into my mind.”

Robert K

3. Sensory sensitivity

Some individuals with sensory sensitivities reported that bright overhead lighting in their homes causes mental distress.

For some, this type of lighting exacerbates physical impairments, particularly during times of fatigue or health flare-ups.

The absence of dimmable or adjustable lighting adds to the challenge, making it harder to create a comfortable and accessible living environment.

CASE STUDY

Sam

Lighting

Sam lives in a home with lighting that is inaccessible for them.

Describing the lights in their home, they said **“all the lights are spotlight things that are on the ceiling and there are like 7 of them in every room and they are super bright and overwhelming.”**

Sam explains the importance of accessible lighting for their well-being: **“as someone who’s also neurodivergent, I have a lot of sensory sensitivity stuff and it very much crosses over with my health – my physical health condition – so that when I’m either overwhelmed or exhausted or having a flare-up, light becomes a lot more sensitive.”**

“I spend the majority of my hours in my one room but [...] the only way of lighting the room properly is to have these big bright overhead lights that make everything very sterile and yeah stressful.”

At the moment Sam cannot change the lighting in their home, but they said more accessible lighting would be **“lighting that was warmer, or that you could change the shades of, or that you could dim the lights the different ways or it wouldn’t be all overhead.”**

Currently, Part M of the Building Regulations does not include features specific to noise or lighting, focusing primarily on physical accessibility features. However, our findings indicate that these lighting and noise are significant accessibility issues for some individuals.

Flashing doorbell and fire alarms

In the survey, 9 respondents indicated that they lack a flashing doorbell, identifying it as a necessary feature for their homes. Flashing doorbells serve as essential tools for D/deaf individuals who require a visual alert to signal visitors. Flashing fire alarms are also an important tool for D/deaf people as a visual alert in case of a fire emergency.

Case study interviews

Among the case studies interviews, issues regarding flashing doorbells were also reported by D/deaf and hard-of-hearing interviewees. A few expressed that they either do not have flashing doorbells or fire alarms or that their existing ones are broken, with landlords failing to repair them.

One interviewee highlighted the danger of not having proper alerts:

// So you know I have to let the security officer know that I live here right on the 15th floor, and if the alarm’s going off, I’m not going to know. So, you’re going to have to inform me, but he actually refused.”
Almarie

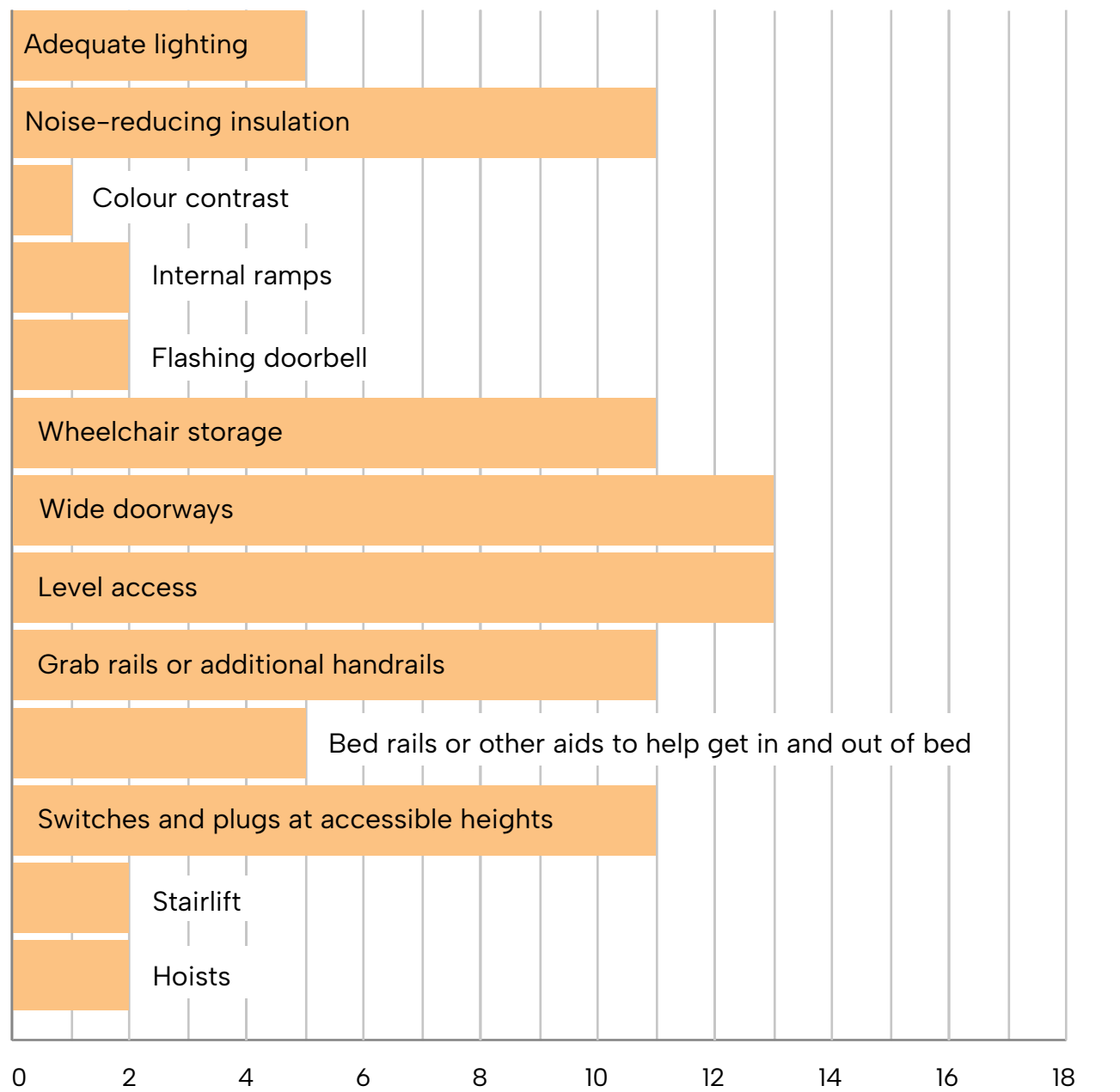
Additionally, the lack of flashing fire alarms emerged as another significant concern during the interviews.

// I ought to really have a flashing fire alarm, because if I’m asleep, when I take my hearing aids out, I don’t think I’d be able to hear the fire alarm.”
Abbi

Missing accessibility features by mobility impairment

Wide doorways, switches and plugs at accessible heights, level access and wheelchair storage are all required design features of M4(3) wheelchair user homes. However, a significant number of respondents to our survey reported that these essential features are lacking in their current homes.

Missing accessibility features by mobility impairment



The graph overleaf shows how many respondents with mobility impairments told us they lack certain accessibility features that they need, excluding outside of the home and kitchen/bathroom.

- Approximately 1 in 3 respondents with mobility impairments indicated that their doorways are not wide enough to accommodate their needs.
- Roughly 1 in 3 respondents with mobility impairments told us they do not have level access in their homes. This means that their homes have barriers such as steps, uneven flooring, or thresholds that make it difficult or impossible for individuals using mobility aids, such as wheelchairs or walkers, to move freely and safely.

Case study interviews

Space

Interviewees shared that the lack of space within the layout of their homes is inaccessible for them.

In particular, interviewees with mobility impairments reported that the lack of space in their homes make it impossible for them to use the correct mobility equipment. This includes there not being enough room to turn around in a wheelchair, hallways being too narrow to walk through with mobility equipment, and a lack of storage room to store mobility aids such as walkers and wheelchairs.

I even have [...] an orthopaedic chair that reclined and stuff that OT had provided to me, but I can't actually use it to recline because there's no space for it...

Also, I was approved for an electric wheelchair by NHS years ago, but the terms of that is that the wheelchair has to fit in your flat and it can't even get through the door.

So they won't approve it."
Steph

Impractical layouts and lack of space also pose barriers for interviewees with visual impairments, where the lack of space means they cannot freely walk around their homes.

The layout is impractical. It's impractical for a person with full vision. But for someone who's impaired, it's very, very difficult. And many times, I have to walk into cupboards."
Robert K

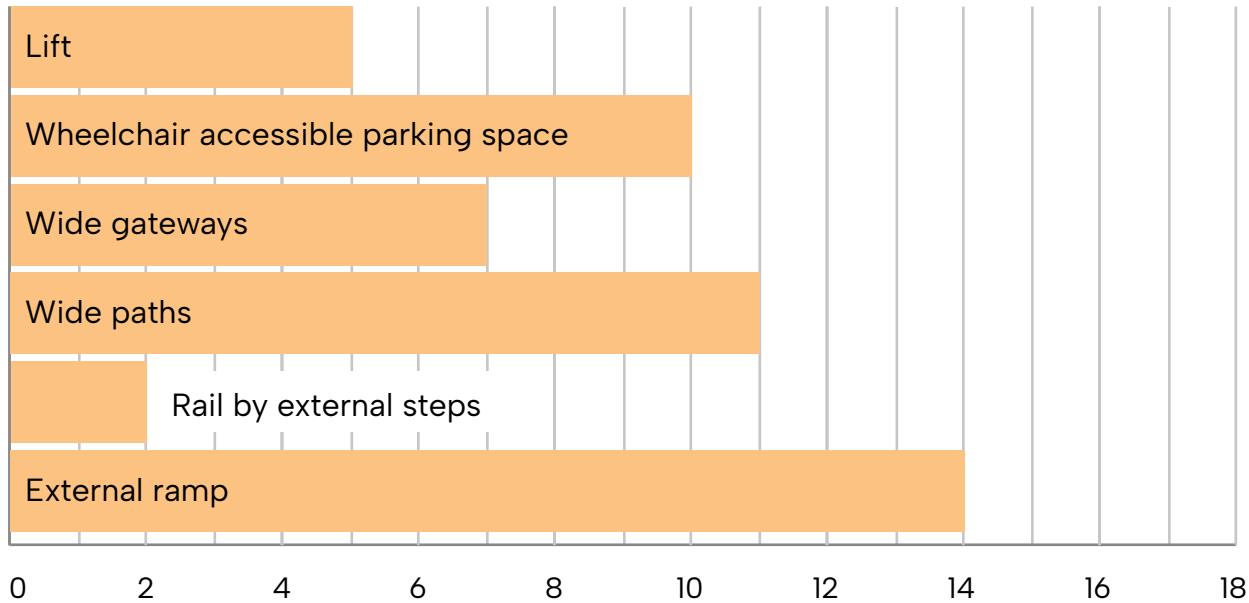
Level access

A number of interviewees also mentioned that their homes were not level access. This means that their homes have barriers such as steps, uneven flooring, or thresholds that make it difficult or impossible for individuals using mobility aids, such as wheelchairs or walkers, to move freely and safely.

The floor in our hallway is quite slanted, and I'm not very stable on my feet so the concern is that I'd fall over or fall down the stairs or something like that."
Lizzie

Entrance to home

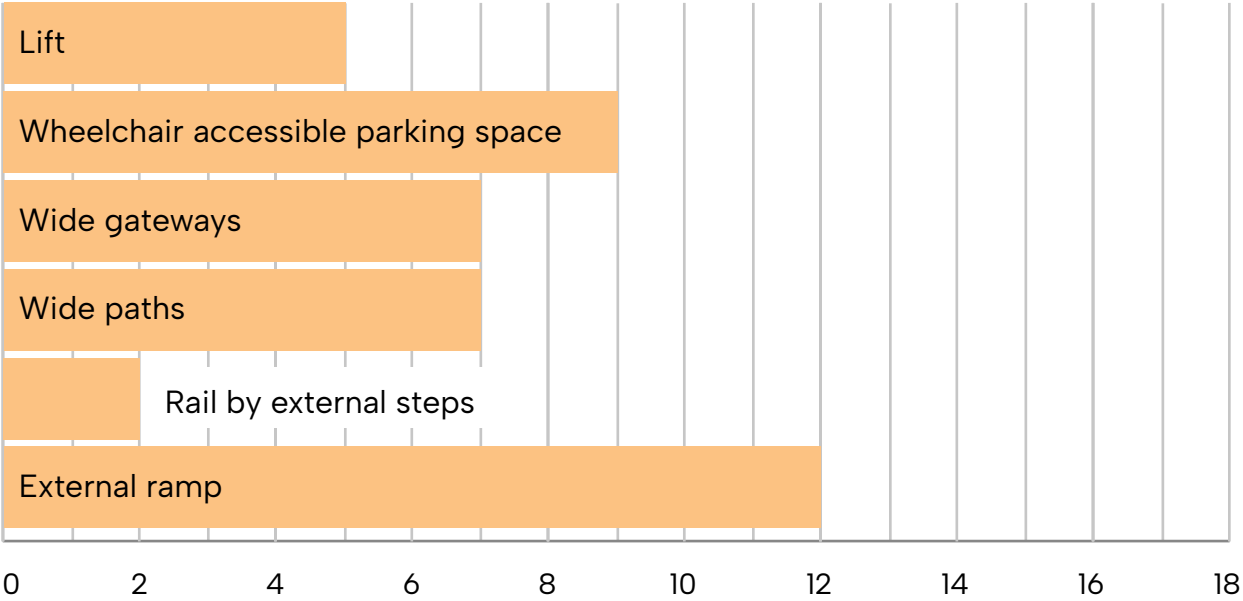
Missing access features outside of home



The above graph shows the accessibility features that respondents are missing outside of their home.

- 1 in 6 respondents lack an external ramp to get in and out of their home, which they need.

Missing features outside home (mobility impairment)



The above graph shows us how many respondents with mobility impairments told us they lack certain accessibility features outside of their home.

- 1 in 3 respondents with a mobility impairment said they lack a ramp outside of their home.
- 1 in 3 respondents with a mobility impairment said they lack a wheelchair accessible parking space.



Photo: Alexander Grey

Case study interviews

Through the case study interviews, we gained deeper insights into the barriers present in the entrance to interviewees’ homes.

Half of all case study interviewees shared experiences of living in a home where the entrance to their home was inaccessible to them.

Several interviewees mentioned that the entrance to their homes has barriers which mean they cannot easily enter and exit their homes. These barriers include stairs, thresholds at the bottom of doorways, broken lifts, narrow hallway entrances, etc.

Every time I need to leave my house, I have to stand up and push my chair to my front door, try and navigate opening it, pulling the door towards me and falling over my chair a bit, and then kind of trying to carry it over the lip of the door, and then shutting the front door and then trying to climb over my chair into my chair to sit in it to be able to leave.”
Sam

I think because I wasn’t in a wheelchair, people didn’t really understand that actually with crutches or with sticks, you also do need extra space and kind of just as much to be able to move around freely.”
Stephen

Parking

10 survey respondents reported that they do not have the wheelchair accessible parking space they need.

This issue was also mentioned in the case study interviews. Disabled people without designated parking spaces face issues with other people using their spaces, or bureaucratic barriers from parking companies when attempting to access their parking spaces.

CASE STUDY

Sarah Parking

Sarah is a wheelchair user who needs a sheltered wheelchair parking space.

When Sarah first moved into her Housing Association Property, she was allocated a wheelchair accessible parking space. However, eventually the parking space was taken away from her when a new management company took over:

“My housing association suddenly tries to take my space away, and they said you can park outside the estate, but on the street parking, which I can’t... I’ve got a hoist that I need to use for my car. I can’t do that, I need to be nearby.”

Losing her parking space significantly impacted Sarah’s daily life. She emphasized the importance of having this space: **“I wouldn’t have even accepted the flat if it didn’t come with parking because I need to use my car. They’re like, just park somewhere else. I’m like, what about when it’s raining? I’m trying to get in my car with my wheelchair; that is my space.”**

As Sarah lives in a purpose-built wheelchair user property, she said it should come with wheelchair accessible parking. The stress of dealing with these issues intensified over time, as Sarah received 17 parking tickets, which were sent to debt collectors. **“I was not feeling protected at all during this time,”** she said. **“I was getting all these debt collecting letters, and it was stressing me out so much because they were saying, no, that parking space is not yours.”**

Speaking of the impact of this situation, Sarah said **“you’ve got to fight them but then I’m like you know what fighting them [and it] just absolutely drains you”**

Eventually, Sarah was able to resolve her parking issue. However, she also told us that she needs an extra parking permit:

“Now they just won’t give me an extra permit so it just makes me feel so isolated because I’m right at the end of my estate [...] so it does put off carers coming in because if they do use cars and they can’t park they’re coming at nighttime and they don’t want to walk through this dark estate and also like family, like my sister’s Disabled, she can hardly come visit me because of the parking.”

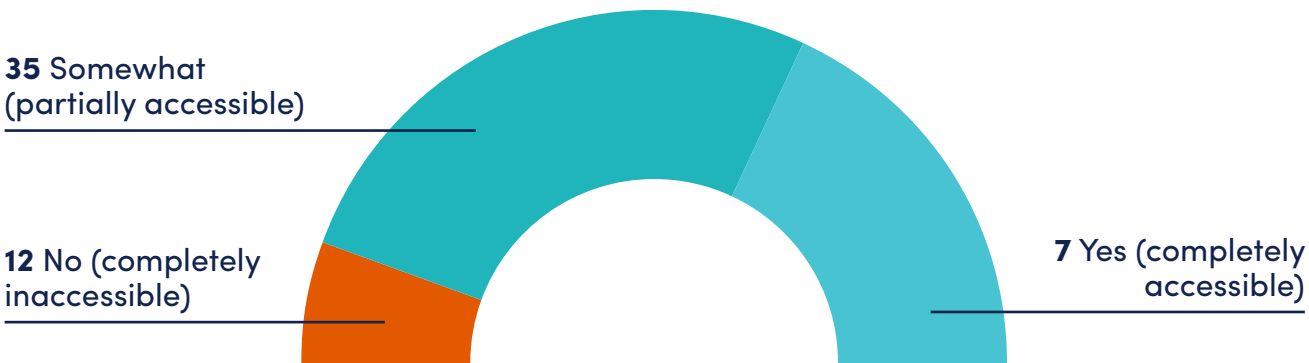


Photo: Levi Meir Clancy

Accessibility of the local area and the wider built environment

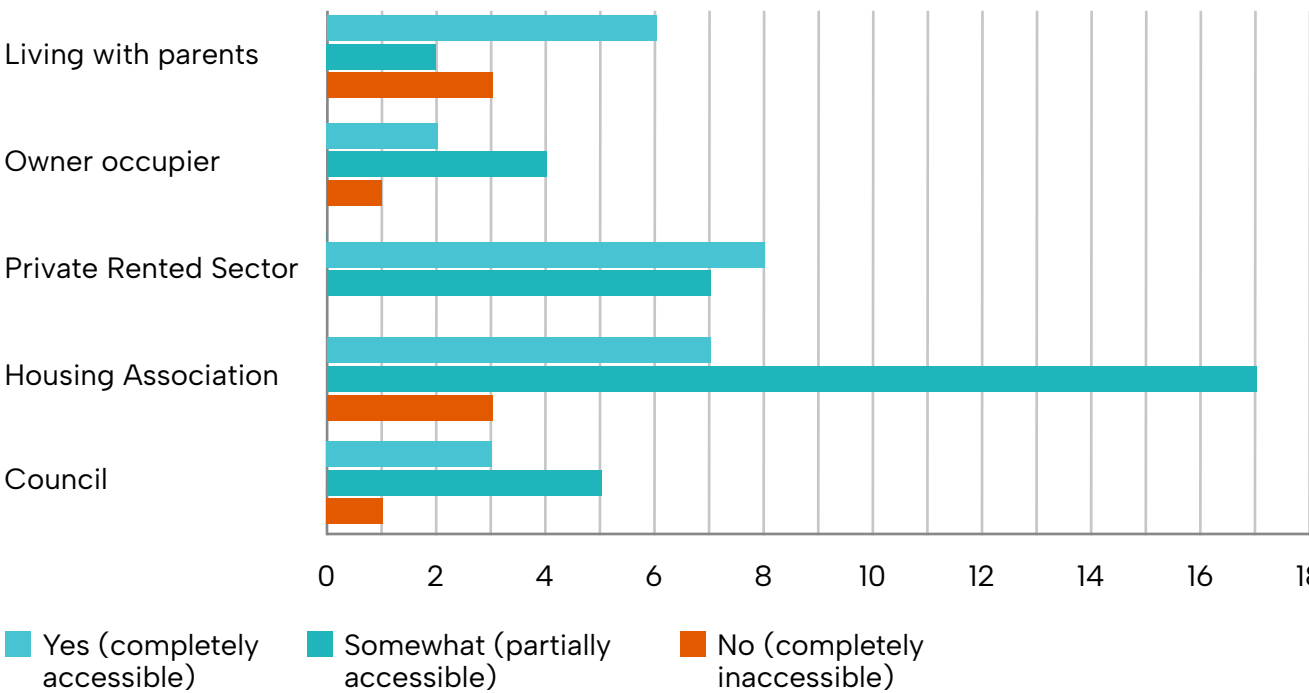
An accessible home needs to be located in an area which is accessible, meaning an area with accessible transport infrastructure, accessible shops, healthcare facilities and other services. This is because if a home meets accessibility requirements but is located in an inaccessible area, it can still impact an individual’s independence and well-being.

Missing features outside home (mobility impairment)



More than half of all survey respondents said their local area is not completely accessible to them.

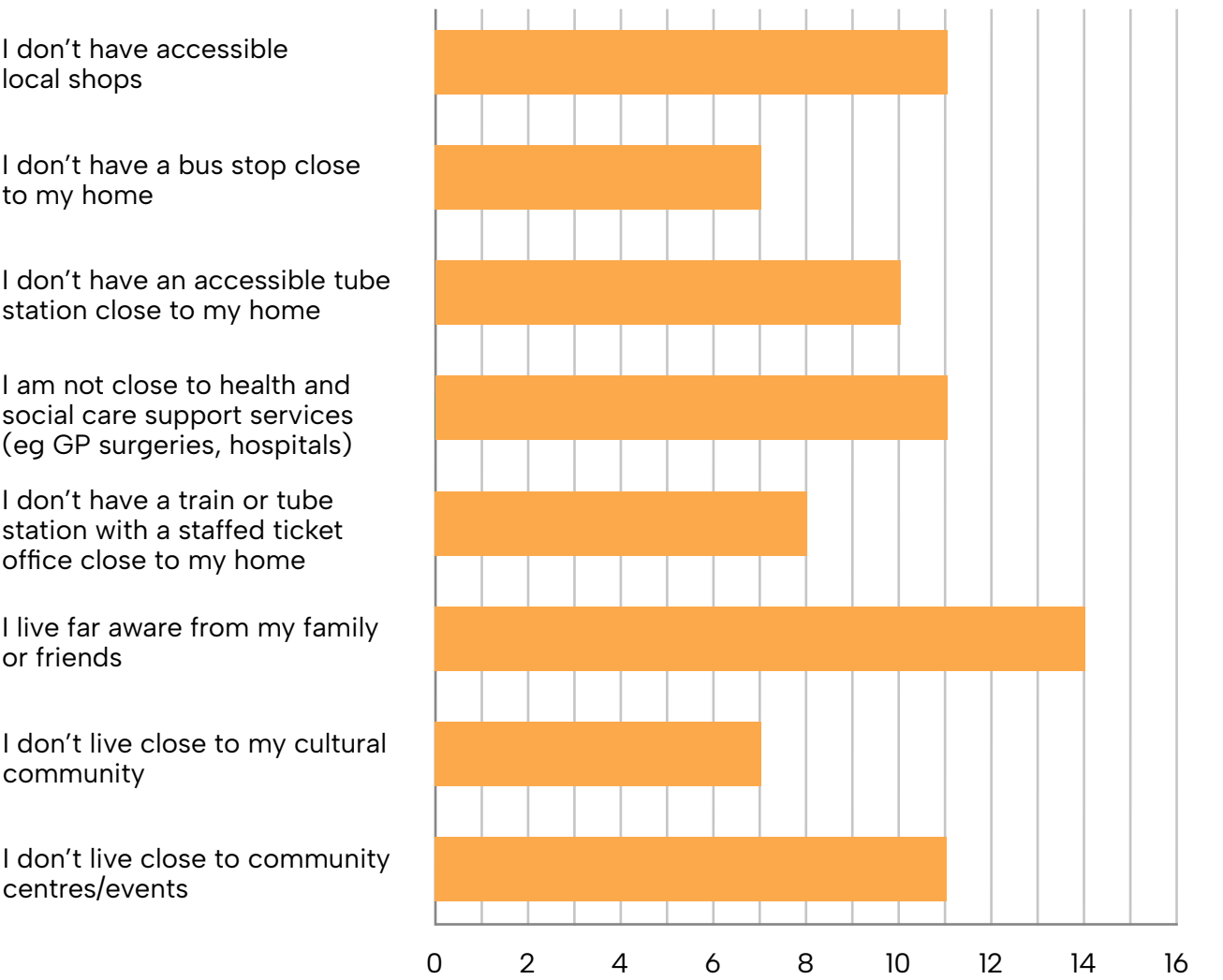
Local area accessibility (by tenure)



Across all tenures, except the Private Rented Sector, a portion of respondents reported their local area not being completely accessible.

Just over half of all private renters who responded to this question said their local area was accessible. This could be reflective of a higher choice of location for private renters, as opposed to social housing, where tenants have less agency over the location of their home. Nonetheless, it is difficult to conclude this, as owner-occupiers also reported that their local area was not completely accessible.

Overall inaccessible – reasons



The most common reason respondents gave for their local areas being inaccessible is living far away from family and friends.

Transport

A number of survey respondents reported issues with their local transport network including not having a bus stop close by (7 respondents), not having an accessible tube station close by (10 respondents), not having a ticketed train or tube station close by (8 respondents).

Transport for All carried out in-depth research into transport issues for Deaf and Disabled people, with many respondents from London. They concluded that transport is largely inaccessible, with over half of all respondents in their report being unhappy or extremely unhappy making journeys.²⁶

Case study interviews

Similarly, during the case study interviews, the importance of good transport links in Deaf and Disabled People's local areas emerged as a common theme.



14 of the 22 people we interviewed told us that local transport options were inaccessible to them.

Bus

- Many individuals reported issues with buses, particularly with prams occupying the designated wheelchair user spaces. They expressed frustration with bus drivers who sometimes fail to enforce the rules requiring prams to be folded to make room for wheelchair users.
- Bus stops being on a slope make it difficult for wheelchair users to get onto the bus.

// So, if I need to go to a doctor's appointment, I need to try and hop on the bus and that takes about 40 minutes.

Every time I try and get on that bus, there are mothers with prams who don't fold the prams...

And the law is they have to go ask them to move. It never ever happens. So just having to face public transport to get to my doctors is horrible, I hate it."

Andrew

Train and tube

- Interviewees shared that broken or non-existent lifts make it impossible for them to use tubes and trains.
- Ramps and assistance at tube stations are unreliable. Individuals reported arriving at stations where they had pre-booked assistance but it not being available.

Pavement and street conditions

- Residents further away from accessible transport options reported additional barriers such as uneven pavements, poorly marked drop-curbs, and obstructed pathways.
- These issues can significantly lengthen travel times as individuals are forced to navigate longer, more burdensome routes to avoid physical obstacles. This includes walking on the road to avoid obstructions.

// People kept leaving their Lime bikes right across that very thin bit of pavement or like knocking the bin over there... So now I have to just drive my chair down the centre of the road to get to the other side of the estate while there are cars coming from both directions."

Sam

// It's just waiting for someone just to fall over, break an ankle, break a hip. I'm very independent. I'd like to go out. I want to go to the shops. I'd like to sort that out myself. But I'm too frightened."

Robert K

// But, yeah, I do have to wheel in the road for quite a bit of it, and it is dangerous, objectively dangerous."

Abbi

// **But the road is a little bit flatter so I would wheel on the road instead."**
Lizzie

Discrimination

- Several participants reported discrimination whilst using public transport including being physically assaulted.

Shopping



Half of all case study interviewees told us that their local shopping options are inaccessible

Physical access

A number of individuals told us that their local shopping facilities are physically inaccessible for them. Common issues include steps at shop entrances, narrow aisles that make it impossible to use wheelchairs or other mobility aids. Therefore, individuals reported only being able to use larger supermarkets, which are sometimes further away from where they live.

// **Every single day I see, I go past places that I cannot get into [...] feels like you're constantly asking permission basically to be me and to be present."**

Abbi

// **Yeah, I mean supermarkets near me are fine because they're big and open and accessible, but it's just like the smaller shops and cafés and stuff and bars.**

I wish that I could get into those but it's just not gonna happen."

Sarah

Reliance on online shopping

As a result, interviewees told us they often rely on shopping delivery services to get their food. Some expressed that this is their preferred method of shopping, and that they enjoy the social aspect of shopping in

person. Therefore, inaccessible shopping facilities mean they are less able to engage with local facilities and community.

// **So, like groceries, I've learned to live indoors, and everything is online, and everything comes to my place instead of me going."**

Gemma

Sensory and design issues

Another issue that arose was that certain design elements in shops create barriers for individuals. These include unexpected noises, bright colours and lights.

// **So, things like those electronic screens not flashing, the lighting is another issue for all people that have sensory issues.**

So that's another thing, very colourful posters in winter shop windows."

Faye

Health and social care support services

11 survey respondents indicated that their local health and social care services are inaccessible to them. This was also an issue that emerged in the case study interviews.

Sports facilities

Several individuals reported challenges with using local sports facilities due to poor maintenance and accessibility issues. Problems include broken lifts in gyms and non-functional swimming pool equipment, which severely limit access to exercise options. These issues not only restrict individuals' ability to participate in physical activities but also affect their overall well-being and health management.

// **We don't really have accessible sports places. Our local gym that you get referred to – they built the whole thing with only one lift and that one lift has been broken every few months from the time they opened.**

“And currently now I think it’s been like 4 months. And even the only step free thing that you can do is go to the swimming pool, but the swimming pod that I use to get into the pool is like a wheelchair accessible one that’s broken as well.

“So, things that actually can help you that they’re not accessible because they’re not maintained. Or no one wants to take responsibility.”

Steph

Hospital facilities

Accessing hospital facilities was reported as a significant issue by many individuals. They told us that public transportation is often a barrier, which sometimes means they are late for appointments. Additionally, some individuals reported issues with borough-specific health-care treatment – individuals in the private rented sector felt it is difficult to commit to health care treatment as they could be forced to move at any time due to eviction or rent increases. Others just cannot access treatments which are offered at health centres which are borough-specific. Due to living in social housing, they are not able to move homes to access treatment elsewhere.



Photo: Age Without Limits

CASE STUDY

Stephen Local area

Stephen is a Disabled individual living in a housing association property, he has regular hospital visits for his health conditions. The hospitals where his appointments are, are located far from his home, making getting there very difficult. He shared, **“It’s become more of an issue for me to get there and back, and I don’t want to have to change my healthcare set-up because of not being able to get to the hospital and back easily.”**

Despite his need to move closer to the hospital, Stephen has faced significant barriers. He said:

“Public transport is not brilliantly accessible for those two places from here [...] I drive myself to appointments but it’s not an ideal situation and the more limitations I find that I’ve got on my health, the more that becomes an issue.”

However, due to the limited availability of wheelchair accessible properties, Stephen has been told that he cannot apply for an internal transfer, unlike non-disabled tenants.

“They have told tenants in their wheelchair accessible flats that whereas any other tenant could apply for an internal transfer, we can’t. We have to go to Lewisham’s housing list,” he explained.

This lack of flexibility leaves Stephen unable to relocate to improve his access to essential healthcare.

// Well, not a very good one really..."

Tracey

// We haven't had a very good experience with our housing association and our property is not very accessible for me at all..."

Lizzie

What is your experience of housing in London as a Deaf or Disabled person?



// Yeah, so it's horrendous..."

Steph

// Awful. As a Disabled person to get access to proper housing is very difficult..."

Corinne

// I don't know, it's been interesting. It's probably the best way to put it..."

Cassie

// I think it's really insecure..."

Paris

// Not great. It's very, very bad. I've been on the waiting list for over 14 years for overcrowding..."

Fatimah

// It's not very positive."

Sarah

// I don't think I ever lived in a house that has met my access needs. So not great..."

Sam

// Well, to be quite frank, it's not been very good..."

Almarie

// So it's been pretty up and down..."

Abbi

// Horrible, absolutely horrible..."

Isabel

// I'd say that my experience broadly is that housing is inaccessible..."

Andrew

Impact of living in inaccessible housing

In this section, we delve into the detailed findings of our qualitative interviews with Deaf and Disabled people, to show the profound impact that inaccessible housing has on every aspect of their daily lives.

Main themes

The people we spoke to represent a variety of experiences. We spoke with individuals with a range of impairments, living in both accessible and inaccessible homes, across various tenures and different areas of London. From these interviews, we identified key themes that emerged.

The majority of our interviewees reported that the lack of accessible features in their homes worsened their physical impairments, harmed their mental health, heightened feelings of isolation and reduced their sense of independence.

Physical health

Our findings indicated that performing daily tasks in a home environment that does not meet Deaf and Disabled people’s needs has profound consequences on their physical health.

For Disabled people, living in an inaccessible home means living in a home which is not built to allow them to use all of its facilities, such as the kitchen, bathroom or even the front door. However, Deaf and Disabled people still have to get on with day-to-day tasks even when their homes are not accessible.

17

17/22 interviewees reported that living in an inaccessible home at some point in their life had a negative impact on their physical health.

The personal accounts of the people we spoke to illustrate the difficulties people deal with when they are forced to interact with a living environment that presents significant physical barriers.

Overexertion and injury

A prominent theme in our interviews was the link between housing inaccessibility and overexertion and injury risk.

Several people told us that they injure themselves to perform daily tasks due their home not being designed to meet their needs. Some interviewees pointed out that they often have to move their bodies in ways that cause them harm. Others mentioned they can’t use their mobility aids because their homes lack the accessibility features they need to navigate their home environment.

- //

I’ve got a garden, and I couldn’t get out there properly. [I was] dislocating my shoulder when I was trying to get out there.”
Sarah
- //

I live on the first floor with 17 stairs. The clinic say that is affecting my health, my back and my stability is getting worse.”
Fatimah



Photo: Age Without Limits

CASE STUDY

Andrew

Overexertion and injury

// I just want to have an accessible home and an accessible environment. You know, my body is wearing out quicker than most people's. And it's wearing out even quicker having to interact with environments that don't suit me."

Andrew is an ambulatory wheelchair user, who lives in an owner-occupied home. He has been using a wheelchair for the last 5 years, but his home does not allow for him to use the wheelchair that would best suit his needs.

"So I was able to get a wheelchair voucher for a folding power chair, which does work for my flat. But it's not the right equipment for me. So unfortunately, it hurts me to use it. But I've had to compromise on the mobility equipment I use in order to fit in with inaccessible housing."

This compromise forces Andrew to use his legs more than he should, leading to physical strain:

"So for me, that would be about straining my body having to interface with inaccessible things. So, either I have to use my legs to stand up, which I can do, I am ambulatory, but that tires me out more."

Andrew's home also poses daily risks:

"And even like reaching for plugs and stuff, that's an opportunity for me to injure myself, unfortunately. And that's sort of the reality, that everyday tasks can really hurt me and then set me back just because things aren't put in an optimal way."

The impact of this prolonged wait for a home which meets his needs takes a massive toll: **"I just want to have an accessible home and an accessible environment. You know, my body is wearing out quicker than most people's."**

"And it's wearing out even quicker having to interact with environments that don't suit me. But if that's like trying to stretch for something in the supermarket and my arm goes, because it's too high up, or doing the same thing in the house."

As Andrew's experience shows, having to live in a home which is inaccessible can lead to overexertion and injury. Many of the interviewees mentioned not being able to use their mobility aids in their own homes as there is not enough space, or their home has steps.

Having to move their bodies in harmful ways to get around and use the facilities in their home leads to unavoidable harm and, in some cases, long-term damage.

Individuals reported needing to use mobility aids more often or experiencing chronic pain after living in inaccessible homes due to the toll that environment had on their body.

// So, well, my physical health, went worse, much, much worse. Like, I was able to walk for an hour with a stick, an hour with pauses, to the park and I was able to do that and now I'm not."

Gemma

Challenges in following medical advice

Our research findings strongly indicate that living in inaccessible or partially inaccessible homes can worsen people's impairments and sometimes create new ones.

Many Disabled people need to follow and to maintain certain routines, such as a certain diet or physiotherapy schedule, to be able to manage their health conditions and/or impairments. However, not having enough space, or necessary accessibility features can create barriers which end up having a negative impact on their physical health.

CASE STUDY

Steph

Challenges in following medical advice

// **“How do you try and work on your health when you can’t even get your housing situation right?”**

Steph, has been living in a temporary supported housing for 13 years, despite initially being told she would only be there for 2 years before moving onto somewhere permanent. Her home is not designed for a wheelchair user, which means she cannot use her mobility aids inside. It also means that everyday tasks are impossible.

The design of her room means that Steph cannot maintain the diet and exercise routine that is necessary for her impairment types.

“I don’t have space for physio. I don’t have space to do the exercises.”

Speaking of the importance of her ability to do her exercises, Steph said **“I’m allergic to most medications so alternative therapy is really much needed and I can’t even do that because there’s no space in this place.”**

Additionally, Steph’s diet is impacted by her inaccessible living environment:

“I have so many health conditions and I should be maintaining them, and I have to have a special diet.

“I can’t even do that because I can’t get to my fridge properly. I have to wait for someone to come and help, or keep things out and then they go off because I can’t put them in the fridge.”

Steph also cannot access her freezer: **“I can’t keep things in the freezer. I should have ice cubes. I always get hot. I get hot flushes. I get problems with my heart where I need to hold lot of cold stuff to help.”**

Mental health

A common trend throughout our interviews was the strain that living in inaccessible homes had on people’s mental health. The link between housing issues and mental health has been widely reported. Research conducted by Shelter in 2017 found that a significant portion of adults living in England who had dealt with housing issues experienced anxiety, depression, stress, sleeping problems and panic attacks.²⁷

Nearly all 22 case study interviewees mentioned that the accessibility of their home had an impact on their mental health.



Of these, 19 reported a negative impact from living in inaccessible homes, while 3 noted the benefits of living in accessible housing.²

Chronic stress and anxiety

Inaccessible homes often create a constant state of stress and anxiety.

Interviewees described how the physical barriers present in their homes, of navigating stairs or unsuitable spaces, lead to chronic pain and exhaustion which, in turn, worsen their mental well-being. Our research suggests that physical and mental health are connected, with one often deteriorating due to the other.

// **So, the bathroom – it still had a bath, it wasn’t a wet room. So, then that became very difficult, to the point where it was stressing me, and stress makes my condition worse.”**

Adam

// **I really need to move. I know I can stay here but it’s not, health-wise, safe for me. I have falls which is deteriorating my health furthermore and making me very anxious to go out. The more I stay here, [the] more depressed I stay mentally and it’s not nice.”**

Fatimah

2. Please note there may be some overlap as participants may have spoken about more than one living situation in the same interview.

For some individuals, the constant stress and dissatisfaction with their living conditions not only negatively impacts their mental health but reduces their ability to work, leading to decreased work performance, and a cycle of stress that is hard to escape.

// And I think, at what point do we get to a point where we realise this is not healthy? I do often question, if someone had to measure my productivity at work, it wouldn't be that good because I spend half my day thinking I just want to be out this flat.

So, then you procrastinate at work and then that stresses you out because you've not achieved your to do list, then you're having to do more with the next day and you're just in this loop of stress."
Paris

Depression and loss of self-worth

People also told us that not being able to live as independently as they would like to, due to homes that were not built to enable them to do this, combined with the inability to keep up with daily tasks, caused a decline in self-worth and sometimes depression.

Several interviewees specifically flagged that they had never experienced depression or anxiety before living in an inaccessible home. Some participants shared they had suicidal thoughts or had to be hospitalised for their mental health as a result.

CASE STUDY
Cassie
Inaccessible housing and sense of self-worth

// And that starts with accessible housing because if you have a house that you can live in and exist in, your sense of self gets better."

Cassie is a young professional living in an inaccessible private rented home. As a wheelchair user, her home lacks many essential

accessibility features like raised toilet seats, grab rails, plugs at accessible heights, and level access.

Cassie, who partly works from home, described how their inaccessible home impacts her daily life: **"If I want to sit in my living room, I have to climb 4 steps, which means I can't. So, I have to sit in my bed."** She added that even if she could get to the living room, moving her workspace is impossible because, **"I can't get to the sockets to plug in what I need."**

Cassie lives in a first-floor flat, which complicates leaving the house. **"I can carry it [the wheelchair] down the stairs myself on a good day, but those are hard to come by. So either my partner has to do it or I have to ask my neighbours."** They expressed how this affects their confidence: **"You leave the house, and you don't even have the confidence of knowing you're going back to home... you still have to drag yourself up all of these stairs."**

Reflecting on the impact of her inaccessible home, Cassie shared how it affects their sense of self worth: **"When I can't do things because my house is inaccessible, your sense of value just plummets, even though it shouldn't. And even though you sit there and have every understanding of my value isn't tied to my ability to do this, when you haven't showered for 8 days because you can't because your house isn't accessible... boy, do you feel like a piece of shit."**

She emphasized how an accessible home could improve her well-being: **"When you live in a house that's accessible to your needs and you can leave when you want to, and you can make your own food, and you can use the bathroom when you want to without support or with support that fits... the moment your housing offers you dignity, your sense of self goes up so much that everything else feels feasible."**

Wellbeing

Deaf and Disabled people we interviewed told us that living in inaccessible homes significantly impacted their well-being and quality of life. Interviewees reported that housing inaccessibility negatively affects their sense of independence, their ability to leave their home and socialise.

Participants frequently mentioned that in order to do everyday tasks, they have to rely on members of their family, including partners and children. These tasks include washing, cooking, cleaning and getting in and out of their homes. As a result, individuals reported having to plan their lives around their family's schedules. For some individuals, they reported that this causes a strain on their relationships due to guilt for having to be reliant on them.



A third of interviewees reported a loss of a sense of independence due to the inaccessibility of their homes.

“Being able to get in and out of the house without needing help would be quite freeing. At the moment, if I want to go somewhere that’s reliant on my husband being home and being able to help me and being able to get the chair out and get me down. There’s a couple of steps outside our house so he needs to assist me with that, and yeah, sometimes if he’s not here, I have to arrange my life around him being able to help me.”

Lizzie

“I rely a lot more on my partner and my housemate to do the cooking or I’m like unable to eat sometimes if no one’s around and, yeah, it just takes away a lot of freedom and choice and agency to make a decision about when I want to eat or when I want to leave the house.”

Sam

The notion of ‘freedom’ was regularly mentioned by interviewees. The lack of freedom to make decisions in their day-to-day life due to the lack of independence caused by their inaccessible homes was often cited as a problem. Many reported that if their home was accessible, it would enable them to live their lives in the way they wanted to.

Not leaving home



Half of all interviewees told us that they leave their homes less often due to inaccessibility.

This includes the inaccessibility of both the interior and exterior of their house. Individuals explained that they do not leave their home as often as they would want to due to various barriers present, including:

Entrance to home: many people reported that physically getting in and out of their homes is very inaccessible for them. Reasons include lifts frequently breaking down, having stairs to get in and out of the home, narrow doors, lack of ramps. These features of their homes acting as obstacle for them getting in and out of the house using mobility aids, or without the help of others. Therefore, interviewees told us they leave the house less often as a result.

“To go out sometimes I keep on postponing because, just thinking of those 17 stairs that I need to climb, is it worth it?”

Fatimah

Exhaustion of living in an inaccessible home: some interviewees stated that the extra energy it takes them to complete day-to-day tasks within their homes take such a mental and physical strain on them that leaving their home is very difficult.

“It probably did make me slightly less sociable than I would have been because I felt like can I be bothered to leave the house?”

Abbi



Photo: Disabled and Here

Social life

12

12 out of 22 respondents reported that inaccessible and unaffordable housing negatively impacted their social life.

Individuals mentioned that their social life is negatively impacted by inaccessible housing. Many noted that their homes are unsuitable for hosting their Disabled friends and family or that they are unable to visit other friends' inaccessible homes.

Inaccessible homes meaning they can't invite round friends or family

Several Disabled people told us that their homes are not suitable for hosting guests for a variety of reasons. These include that their homes are too small to host family and friends or lack the accessibility features their Disabled friends and relatives need to be able to access their homes, including step-free entrances and accessible parking spaces.

“My dad was really poorly last year, so now he’s having problems with his mobility, now he’s needing to be able to park close, but he can’t... As other people get health issues and stuff, it’s just making me more isolated because [...] they can’t just park outside to come and see me.”

Sarah

Financial burden

Interviewees reported that due to living in inaccessible homes the only option for them to socialise is to go outside of their house and pay for meals at restaurants or cafés. For some people, this creates a financial burden they cannot sustain, and they reported socialising less as a result.

Isolation

Disabled people reported they experience feelings of isolation as a result of not being able to invite friends and family to their homes due to them being inaccessible and therefore being unable to engage with their own community in their own homes.

“I would have more of my community being able to be in my space if they could get through my door easily.”

Sam

“I don’t go out socialising as much as I used to, which is a shame, especially when you are housebound for some periods of time. It’s so important to go out and see people and socialise with your friends and just get out of your environment.”

Corinne

4.

Are we building the accessible homes Deaf and Disabled Londoners need?



Introduction

Our research into the housing experiences of Deaf and Disabled Londoners revealed that there are Disabled people with a wide range of impairments residing in different tenures who live in unsuitable accommodation and have, therefore, significant unmet housing need. Our findings revealed the detrimental impact that living in such inaccessible homes has on Disabled Londoners' physical and mental health and highlighted the importance of ensuring all Disabled people have access to homes that meet their needs to reduce health inequalities.

Matching accessible housing supply closely with need in London is crucial but this is only possible if local planning authorities are able to accurately predict the need and demand for accessible housing and therefore have local plans, policies and strategies in place that are fit for purpose to enable them to deliver accessible housing.

In light of this, our research aimed to investigate the extent to which planning policies set by the GLA in the London Plan support the delivery of accessible housing across the capital. Particularly, we sought to assess whether London Plan policies are effective in increasing the supply of accessible housing. In this chapter, we report an analysis of:

- The current data provided in the London Strategic Housing Market Assessment which fundamentally contributes to the development of the London Plan and the Mayor's Housing Strategy. We undertook this to understand the evidence base the GLA relies on to develop policies and set targets in the London Plan.
- London Plan Policy D7 on accessible housing as well as approvals and completions rates of new build accessible and wheelchair user homes supplied by applicants and boroughs on the GLA's London Planning Datahub and included in the GLA's London Plan Annual Monitoring Reports. We undertook this to understand whether accessible housing targets are being met and whether they are adequate to address Disabled people's housing needs.

In addition to investigating GLA's planning policies and evidence base, we also aimed to examine whether local authorities are meeting their Public Sector Equality Duty under the Equality Act 2010 when developing local

plans and local housing policies, by giving due regard to the specific needs of Deaf and Disabled people. We particularly sought to assess the evidence base local authorities rely on to plan and deliver the homes Disabled people need.

We examined local authorities' development plans, local housing assessments and housing strategies to assess whether they included any policies and targets supporting the delivery of accessible housing as well as any specific information about Disabled people's housing need.

In this chapter we report an analysis of:

- responses received by 31 local authorities to FOI requests submitted to 33 councils to understand whether and how they assess Disabled people's housing requirements in their local areas and whether they have an accurate knowledge.
- findings from semi-structured interviews we conducted with 6 local authorities in London. These interviews were done to explore whether councils face any barriers in delivering accessible housing and what support they might need to be able to increase the supply of accessible housing in their boroughs.



Photo: Simon Lamrock

National Policy Context

Building Regulations 2010

Planning policy sets guidelines for what is and is not considered accessible housing and how much of it needs to be built. Part M of the Building Regulations 2010 sets out the standards for how new housing developments in England should be built.²⁸ It defines 3 different accessibility standards for new build housing:

M4(1) Category 1: Visitable dwellings. This applies to homes that are built so that they can be visited by most Disabled people. This includes the entrance being step-free, where possible, and a room which may be a bathroom or a cloakroom containing a toilet on the entrance storey.

M4(2) Category 2: Accessible and adaptable dwellings. This applies to homes that are designed in such a way so that they can be adapted to meet people's changing needs over time. This means that the entrance must be step-free, access to all rooms in the entrance storey is step-free and some adaptations can be easily made, such as stair lifts and grab rails.

M4(3) Category 3: Wheelchair user dwellings. They are split into 2 categories:

- **M4(3)a wheelchair adaptable:** this applies to homes that are designed to be easily adaptable for a wheelchair user. There should be enough room for a wheelchair user. The bathroom and kitchen should be easily adapted for a wheelchair user.
- **M4(3)b wheelchair accessible:** this applies to homes that should be already fully accessible to a wheelchair user before moving into a property. This means the kitchen and bathroom are already accessible to a wheelchair user.

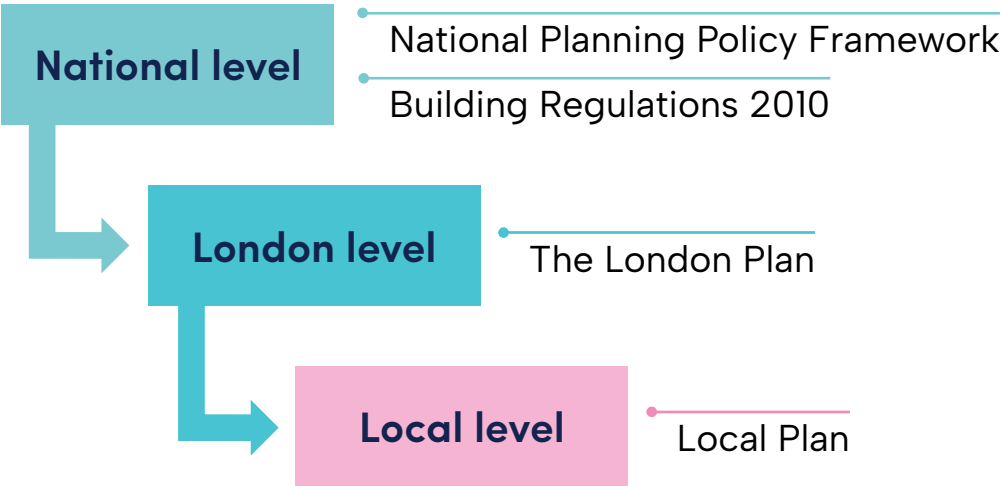
Currently, the M4(1) standard is the default option for all new housing developments in England, while M4(2) and M4(3) are optional standards.

The National Government launched a consultation in 2020 on the standards of adaptability and accessibility. They committed to raise accessibility standards in England – M4(2) was set to become the mandatory minimum

across England.²⁹ As of October 2024, however, this has still not been implemented.

The National Planning Policy Framework (NPPF)

At a national level, the National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied locally.³⁰



The above diagram shows the relationship between national, London and local level planning policies. Planning policies on a local level must be in conformity with London Plan policies which must also follow national level planning policy guidelines.

In the NPPF it is explicitly stated that:

- All local councils should identify what types of housing need to be built for residents through a Strategic Housing Assessment which estimates how much of each type of housing is needed in London. This means assessing people who currently need accessible housing and will need it in the future.
- All local councils in England must plan for current and future housing needs and deliver housing according to need.
- All local councils must use the Governments standards for accessible and adaptable housing to promote health and well-being. These standards are outlined in the [Building Regulations 2010 Part M](#).



Photo: Inclusion London

Analysis of GLA’s planning policies and data

The London Plan

The Mayor of London’s powers over housing and planning are substantial and have grown since 2000, following the promulgation of the Greater London Authority Act (1999). The Mayor is required to produce a Spatial Development Strategy, known as the London Plan, which sets out an integrated economic, environmental and transport framework for the development of London.

Through the London Plan, the GLA have significant powers to set, among other things, the levels of accessible and affordable housing that need to be built in the capital. London Plan housing policies should inform decisions on planning applications across London and all Boroughs’ Local Plans must

be in ‘general conformity’ with the London Plan. However, the strategy must not be inconsistent with any national policies, including the National Planning Policy Framework.

Policy D7 on accessible housing

In London there are higher housing accessibility standards and accessible housing targets in place compared to other areas in England. Policy D7 in the London Plan sets that 90% of housing must meet M4(2) accessible and adaptable standards and the 10% must meet M4(3) wheelchair accessible or adaptation standards.³¹

Policy D7 on Accessible Housing

A. To provide suitable housing and genuine choice for London’s diverse population, including Disabled people, older people and families with young children, residential development must ensure that:

- at least 10% of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’
- all other dwellings (which are created via works to which Part M volume 1 of the building regulations applies) meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.

This means that the London Plan sets out higher minimum standards of accessibility than the minimum standards in the Building Regulations 2010 Part M for the rest of England.

No accessible housing definition

Whilst the London Plan’s Policy D7 on accessible housing does include reference to Part M of the Building Regulations, there is no consistent and comprehensive definition of accessible housing within the London Plan, including in its Glossary. A clear definition of accessible housing should be included in the next London Plan and should not only make reference the accessibility needs of people with mobility impairments, but also to those of people with different kind of impairments, including Deaf

people, neurodivergent and autistic people, people with sensory and visual impairments.

USEFUL RESOURCE

The BSI standard Design for the Mind – Neurodiversity and the Built Environment (PAS 6463) could be referenced in a definition of accessible housing in the London Plan.³²

This standard provides guidance to the built environment on how “to accommodate the neurological variations in the way people perceive, process and organise sensory information received through hearing, sight, touch, smell, taste or movement”. Incorporating this standard into the next London Plan and its associated guidance would enable boroughs and developers to build homes that meet the needs of people who are neurodivergent, have neurodegenerative conditions such as dementia, or hearing differences such as misophonia.

London Plan Evidence Base

London Strategic Housing Market Assessment (SHMA)

As set out in the National Policy Planning Framework, the GLA must conduct a Strategic Housing Market Assessment to provide evidence for the development of the planning policies set out in the London Plan.

The data provided in the SHMA can be seen below.³³

- Altogether there are around 200,000 households in London who require a home adaptation because of the impairment of a household member.
- Of these, around 25,000 households say they are attempting to move somewhere more suitable to cope with an impairment.
- Around 8,500 of these are on a social housing waiting list, of whom around 3,400 are not currently already in social housing. This means they need to move from market housing into social housing.



Photo: Inclusion London

What we can tell from these data:

- There is a significant number of Disabled people in London who are living in unsuitable homes which do not fully meet their accessibility requirements.
- A significant portion of these individuals require social housing.

What we cannot tell from these data:

- **The impairment types** of those needing accessible housing, and their subsequent housing accessibility needs. The SHMA should include a breakdown of impairment types, including mental health, autism, learning difficulties, mobility impairments, visual impairments, chronic health conditions and those who are Deaf.
- **Estimate future and current demand for accessible housing.** These data do not provide any indication of how many older and Disabled people currently need fully wheelchair accessible homes (M4(3)b), wheelchair adaptable homes M4(3)a or accessible and adaptable M4(2) homes and what types of homes they will need in the future.

- **Data about the accessibility of the existing housing stock in London.** The London SHMA does not provide any indication of how many existing homes in London are visitable, accessible or adaptable, wheelchair adaptable or wheelchair accessible, whether the stock can be retrofitted to meet the needs of Disabled Londoners and what kinds of improvements would be needed to address housing need.
- **The areas of London in which Disabled people are more likely to need accessible homes.** It is key that not just the home but the area a home is located in is fully accessible to a Disabled person. An accessible home is also a home that is situated in an area which is accessible for the person living in it – this might be due to transport, access to familial support, cultural community or health and social support centres. Therefore, it is vital that the areas of high demand for accessible housing are also considered when assessing the need for accessible housing.

Data included in the London Strategic Housing Market Assessment is used to inform the London Housing Strategy and London Plan. The current London SHMA does not accurately capture current and future unmet need for accessible affordable housing in London.

It should include estimated projections of how many accessible homes by tenure are needed every year to meet the identified need. Without adequate data about Deaf and Disabled people's housing needs, including their impairments, tenure type and size of the property needed, housing accessibility needs, proximity requirements to support networks and services, and data about the accessibility of the existing housing stock, it is unclear whether London Plan policies are fully adequate to meet current and future Deaf and Disabled people's housing needs.

Whilst the GLA itself does not collect comprehensive data on the housing needs of Deaf and Disabled Londoners, there are higher targets for new build homes than in the rest of the England. However, it is important to understand whether those targets are being met.

In order to understand whether the minimum targets for new build homes are being met, we undertook an analysis of data included in the GLA's London Planning Datahub.

London Planning Datahub

The London Planning Datahub is an interactive tool that holds information on planning applications, approvals and completions of new build homes in London. Data from the planning hub is submitted by applicants (developers submitting a request to build) and Local Planning Authorities.

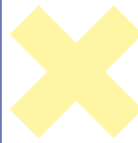
	M4(2)		M4(3)	
	Approval	Completion	Approval	Completion
2018/19	58.00%	62.82%	8.41%	9.61%
2019/20	44.81%	55.22%	6.48%	7.15%
2020/21	6.95%	48.94%	0.99%	7.90%
2021/22	1.40%	47.62%	0.58%	9.08%
2022/23	1.58%	36.21%	3.75%	4.52%
2023/24	3.23%	32.07%	0.80%	6.49%

The data displayed in the above table is taken from a dataset used by the Greater London Authority to show compliance with Policy D7 on the accessibility of new build dwellings.^{34 3}

The data shows the proportion of new build residential dwellings that meet the access standards M4(2) Accessible and adaptable dwellings and M4(3) Wheelchair user dwellings. The data is broken down into approvals and completions of new build homes.

The table illustrates a significant gap between the intended accessibility targets of 90% M4(2) and 10% M4(3) for new build homes that all London planning authorities should comply with, as set in the London Plan, and the actual approval and completion rates reported on the Planning Datahub.

3. Please note that the Datahub and the reports are subject to change as they are updated. The figures shown here were accessed on 02/10/2024.



According to the data reported by the Greater London Authority, on average, local authorities in London are not meeting accessibility targets set out in the London Plan.

Declining M4(2) approval and completion rates

Both approval and completion rates for M4(2) new build homes are consistently well below the targets set out in the London Plan.

- Average approvals for M4(2) homes have rapidly decreased, from 58% in 2018/19 to just 1.58% in 2022/23. This suggests a significant shortfall in approving homes that meet the M4(2) standard, which should be the minimum requirement for all new build homes in London.
- Average completions of M4(2) new build homes have also fallen. In 2018/19 the average completion rate of M4(2) homes across London was 62.82% compared to just 36.21% in 2022/23.

Low M4(3) approval and completion rates

Similarly, the M4(3) target of 10% is not being met across London according to this data.

- M4(3) approvals for new build wheelchair user dwellings have consistently stayed below the 10% target. On average, approvals dropped from 8.41% in 2018/19 to a mere 3.75% in 2022/23.
- Completions for M4(3) dwellings have also remained low but fluctuated, with the highest completion rate being 9.61% in 2018/19 and the lowest at 4.52% in 2022/23.

Reporting issues

It is unclear whether approval and completion rates for new build accessible homes are drastically low because new build homes are not actually built

to different M4 standards, or whether the data is not accurately being reported by applicants and planning authorities. Nonetheless, given the stark disparity between what is being reported and the targets that should be met, we believe that the GLA should investigate the reasons behind this declining trend in compliance with accessible housing targets.

No distinction between M4(3)a wheelchair adaptable standards and M4(3)b wheelchair accessible standards

The London Plan currently does not distinguish between M4(3)a and M4(3)b standards in its targets for new build properties and does not capture and publish data on the number of ‘wheelchair accessible’ and ‘wheelchair adaptable’ homes being built in London, overlooking significant differences between the two. As a result, it is not currently possible to monitor if and where fully wheelchair accessible homes are being built in London.



Photo: Guilhem Baker

Analysis of local authorities’ planning policies and data

In addition to investigating GLA’s planning policies and evidence base, we also investigated whether local authorities in London are meeting their public sector equality duty under Equality Act 2010 by giving due regard to the needs of Deaf and Disabled people when developing local plans and local housing policies. We particularly sought to assess the evidence base local authorities rely on to plan and deliver the homes Disabled people need.

With this objective, we submitted Freedom of Information Requests (FOI) and analysed councils’ local plans and housing assessments.

Analysis of local Plans and Strategic Housing Market Assessments (SHMA)

Each London borough must create a Local Plan. It is a document that provides a positive plan for the future of a borough, including policies on housing.

Strategic housing market assessments are a key part of the Local Plan development process. These documents inform local development plans and aim to evaluate residents’ housing needs within their boroughs by assessing demographic data, housing market trends, and specific community requirements.

In 2023 we examined the local plans, housing assessments and housing strategies of all 33 London local authorities to assess whether they included any policies and targets supporting the delivery of accessible housing as well as any specific information about Disabled people’s housing needs in their areas. Below we included a summary of information relevant to our research. Since this research was undertaken it is likely that some local authorities have created new local plans of housing needs assessments. We have only analysed documents available until 2023.

Data on Deaf and Disabled People

- 10 Local Authorities in London contained no information on how many Deaf and Disabled People live in their boroughs.
 - Only 7 boroughs contained information on the impairment types of Deaf and Disabled People in their areas.
- 5 boroughs contained some information about the tenure Disabled people occupy in their areas.

Data on accessibility of their existing housing stock

- 25 councils did not include any information about how much accessible housing is in the council stock.
 - A further 3 councils noted that there is poor/a paucity of data available.

Our findings suggest that Local Authorities across London lack key data which are required to predict and build the housing needed in their local areas within their strategic planning documents. This data gap reflects a national trend. The Equality and Human Rights Commission (2018) found that only 12% of Local Authorities across Britain rated the data available to them to understand the current and future need for accessible housing as 'good' or 'very good'. Despite this, most local authorities said that they relied on these data sources in their key strategic documents for planning accessible housing.³⁵

The Equality and Human Rights Commission also noted that only a minority of Local Authorities commissioned in-house surveys to inform the development of Strategic Housing Market Assessments.³⁶ From our own analysis of key local authority documents, we found that only 4 used information from their own surveys.

Our findings illustrate that London local authorities lack key information required for strategic planning. **Currently there is no standardised methodology provided to Local Authorities to help them assess the need for accessible housing in their areas and plan according to need.** This is evident through the inconsistency of data collection presented above.

Need for accessible housing



12 boroughs had no estimates of future demands for accessible housing.

Wheelchair accessible homes – M4(3)b homes

26 boroughs set no targets for M4(3)b wheelchair accessible homes.

In the National Planning Policy Framework, it states that:

“Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.”

In addition to this, the GLA’s target of 10% M4(3) wheelchair user homes is a minimum target and local authorities are expected to develop an accurate evidence base and build more wheelchair user homes if indicated by their own assessments.

However, given the lack of available data, it is unsurprising that there appears to be a lack of specific targets for M4(3) fully wheelchair accessible properties.

Our findings highlighted the inadequacy of data collection and monitoring practices of local authorities in London in assessing the local demand for accessible housing. Standards and targets alone are not sufficient, and councils need to collect good quality data about Deaf and Disabled people and their needs in their local authority areas to be able to plan, build and allocate the right kind of housing to people. Relying on a weak evidence base in assessing Disabled people’s needs for accessible housing, means local authorities are not able to deliver the homes their communities need.

Responses to Freedom of Information Requests (FOI)

We submitted Freedom of Information requests to 33 London local authorities between 2023–2024 and had responses from 31 local authorities to identify whether local authorities:

- Monitor how many Disabled people are on social housing waiting lists for accessible homes.
- Understand local authorities’ knowledge about the accessibility of their existing housing stock.

Social housing waiting lists for accessible housing

We asked Local Authorities how many Disabled people were on their waiting lists for a type of accessible housing. Of the 30 local authorities that responded:

- Only 22 could provide the number of people on their waiting lists who required accessible housing.
- A further 5 could provide partial data. For example, they were able to indicate how many wheelchair users were on their waiting list, but they were not able to provide any information about Disabled people with other kinds of impairments, including about people with mobility impairments who were not wheelchair users.



In total, Local Authorities reported 14941 applications for social housing across London were on the waiting list for a form of accessible social housing.



On average, that means that councils reported that 534 households were on the waiting list for accessible housing in each Local Authority.⁴

4. It is noteworthy that this is likely an underestimation. 5 local authorities only provided us with the number of wheelchair users on the waiting lists. If we were to exclude them in our calculations, the average number of households on the waiting list for a type of accessible housing would be 673 per local authority.



Photo: Inclusion London

Breakdown of type of accessible housing

We also asked local authorities to provide us with a breakdown of their housing waiting lists by the type of accessible housing applicants required.

- 20 local authorities could provide us with a breakdown of their waiting lists. A further 2 partially held the data requested.
- 9 local authorities could not provide us with the breakdown of data requested.

We found that local authorities use a variety of accessibility categories to categorise their properties:

- 8 local authorities used the accessible housing register to categorise their properties.
- 7 used mobility level 1, 2, 3
- A further 5 used other categorisations such as medical bands or disability level.

This lack of standardised categorisation highlights inconsistencies in the approach local authorities adopt to monitor and assess needs for accessible homes.

Whilst there are targets for building accessible homes in London that are higher than the rest of the country, these are only minimum targets. In order to plan, build and allocate the right kinds of homes that individuals on the waiting lists need, councils must collect good quality data on Disabled people's housing requirements.

Social housing stock by accessibility level

We also asked local authorities to provide us data about the overall accessibility levels of their social housing stock.

- Only 5 local authorities were able to tell us the overall accessibility levels of their social housing stock.
- A further 3 councils were able to partially tell us the accessibility level of their social housing stock.
- A further 22 did not provide us with the data requested:
 - One of these said this was because it would take them too long to provide the data.
 - One said they did not hold the data in a centrally reportable format.

Our findings mirror conclusions drawn by the EHRC in 2018 that **the majority of local authorities do not know whether their housing stock is accessible or not.**³⁷

Interviews with local authorities: key themes

Overview

Between late 2023 and early 2024, Inclusion London held semi-structured interviews with staff members from 6 London local authorities. These included senior members of staff in the housing, planning and allocation teams, as well as Occupational Therapists and consultants working for the council. We spoke to these local authority employees to explore whether councils face any barriers in delivering accessible housing and what support they might need to be able to increase the supply of accessible housing in their boroughs. We held these interviews to understand:

- Whether local authorities face any challenges in delivering accessible and adaptable housing for Disabled people.
- What data sources local authorities rely on to assess the need for accessible housing in their areas.
- Whether local authorities plan for homes that are both affordable and accessible.
- What local authorities think would improve the delivery of accessible and adaptable housing in their boroughs.

Key themes and findings

There was a consensus amongst most of the local authorities that we spoke to that there is a consistent demand for accessible social housing which exceeds the accessible housing stock available. Interviewees identified the following challenges in building new homes:

- A lack of adequate data about the required homes in their areas
- Issues with developers who:
 - Cut corners on design of accessible homes

- Use viability assessments to reduce the number of accessible homes built
- Do not build the homes that are needed, such as family sized homes, social rent homes, fully wheelchair accessible homes
- Difficulty of enforcing accessible housing targets
- Issues with the design of the homes

In this section we first outline what local authorities told us about the demand for accessible housing in their areas and then give an overview of some of the challenges they believe exist in trying to build the accessible homes needed to meet the demand in their areas. Throughout the chapter, we detail the solutions that local authorities believe could be implemented to tackle the barriers they face.

Demand

Local authorities expressed that the homes they are building do not meet the demand for accessible homes in their areas.

“There isn’t enough suitable accommodation for the demand we have.”

Not building enough new wheelchair accessible homes

Most local authorities told us that the 10% target of M4(3) wheelchair accessible homes is not enough to meet the demand they are dealing with for this type of housing in their boroughs. This is because the current demand far exceeds the current supply, and even as new homes are built, the demand for accessible homes is constantly replenished.

“You’re only getting 10% for wheelchair users, it’s a paltry supply.”

“Like every single borough in the country, we will never be able to build our way out of meeting demand. Demand will always exceed supply.”

Lack of data on housing needs

Local authorities unanimously reported a high demand for accessible housing within their areas. However, several acknowledged that they lack sufficient data on the actual overall housing needs of local Deaf and Disabled people, as well as on the accessibility of their existing housing stock. This presents challenges for them to deliver accessible and affordable homes that meet the needs of their local populations.

Limited data on existing and future demands

Some local authorities expressed that they lacked data on the current and future demands for accessible homes in their areas. They told us that they rely on broad assessments and historical data rather than detailed, up-to-date information about the specific accessibility needs of residents.

“Our local housing need assessment is very broad brush. When we went through our last local plan process, which brought in all the same requirements that had just been adopted in the London plan in terms of the 90% M4(2) and 10% M4(3), we were relying primarily on the fact that the London plan had it, the London plan had produced evidence to justify it, and we just coat-tailed on that. We didn’t really produce anything substantial apart from drawing on the census data”

This exclusive reliance on broad data, like census data, prevents local authorities from tailoring housing developments to the specific needs of Disabled people in their boroughs.

“We are trying to understand that data and get better insight that will then help inform those plans going forward because I think we’re not where we need to be in terms of that data yet.”

In addition to this, we observed a lack of cross-team coordination across some of the local authorities we spoke to, particularly between planning and housing teams, which means planning teams are not relying on data already held by housing teams to plan and deliver housing that is needed. During interviews with employees from the planning teams, we noticed that they were often less able to provide information related to housing demands and waiting lists in their boroughs because they did not have good oversight of the waiting list data from housing teams. As a result, they

were less likely to be able to draw on this data to plan for new build housing, resulting in a lack of joined-up housing delivery which prevented planners from building the homes people in their areas really need.

“There must be wheelchair users or people with other access needs on the housing list. We [the planning team] just don’t have eyes of that. And so, we don’t know if we’ve got 20 people in this ward waiting for M4(3) units and we have one in this ward waiting for an M4(3) unit. We have had situations where we have designed wheelchair homes and then they have just been allocated to general needs.”

Additionally, local authorities pointed out that building the homes people need in the right place, can be very challenging due to a lack of available data about who needs what type of housing and where it is needed.

“But that whole discussion about who needs it [wheelchair accessible housing]? No one’s ever been able to answer this question for me. Is it like spread across the council equally, like every part of [local authority area] needs access to wheelchair housing?”



Photo: Age Without Limits

“Or are there core points in the council where there is a higher demographic of people with wheelchairs, just for the fact that the area is really flat and it’s actually just easier to access local markets and it’s easy to access the local doctors and there are specific support groups?”

“That answer isn’t available because I don’t think people are really thinking about it in that way. I think at the moment it’s a tick box. It’s have you provided wheelchair user housing? Yes. I have – great. Let’s move on to the next thing... You’ve ticked the box. It’s not your problem anymore.”

On the other hand, those local authorities who had a comprehensive oversight of their housing waiting lists and knowledge of Disabled people’s housing requirements in their local area, found housing waiting lists data extremely helpful to plan and deliver the right kinds of homes.

“But in terms of size of properties that has been really helpful, we’ve been able to take our waiting list and evidence to the planners and developers and applicants.”

“Previously, we would just get two bed, three-person wheelchair accessible homes. That was just completely impractical. So now we use the waiting list to evidence. We’ve got a need for one, two, three and four bed homes and five and six...”

Data available about Disabled people’s housing requirements in local authorities’ waiting lists not only assisted them in planning the types of homes needed in their areas but also served as a valuable tool to encourage developers to build appropriate housing to meet Disabled people’s housing needs.

“Also, the numbers of people in the waiting list who use cars, I’ve used that recently with a developer to insist on how many parking spaces that we are given.”

“Our colleagues are able to say that basically 9 out of 10 of the people on the waiting list need a car space.”

This demonstrates the need for local authorities to gather comprehensive information on the housing needs of local Deaf and Disabled people, including data on their impairments, tenure type, property size requirements, housing accessibility needs, and proximity to support networks and services, so they can promote the right mix of housing and build the homes people need.

Challenges in predicting future needs

However, local authorities expressed concern about their ability to predict future demand accurately, citing the limitations of existing data and the uncertainty surrounding evolving housing needs over time.

// Because obviously you've got a client who's presenting now, but a new build property can take 18 months, 2 years to build."

// And that demand that was there 10 years ago is just no longer there within the borough because of other things that have come on stream in the meantime and what the demand is."

Overall, the lack of detailed, accurate and up-to-date data about Disabled people's housing requirements presents a significant obstacle for many local authorities in planning and delivering the accessible housing needed in their areas. While some authorities have made strides in using waiting list data effectively, others continue to struggle with a fragmented and broad approach that limits their ability to meet demand.

Issues with developers

It is widely recognised that new homes are increasingly being built by private developers, as opposed to local authorities themselves. This private sector led approach is also being encouraged by the current Labour Government. However, our interviews with local authorities across London revealed that local authorities often encounter challenges when trying to get developers to build the homes that are needed to meet housing shortages in their areas.

Cutting corners on design of accessible homes

Most local authorities mentioned that some of the accessible homes that are built, are not entirely suitable for people to live in because they do not meet the accessibility standards they claim to.

This is partially due to developers choosing to cut corners and not including all accessibility features required to meet accessibility standards. Local authorities noted that where there is ambiguity and loopholes in Part M of the Building Regulations, developers exploit them to build homes to the lowest level of accessibility. This means that homes which are supposed to be built to be accessible are sometimes unsuitable for Disabled people.

// If you haven't absolutely specified everything, they will just sidestep and avoid it."

// They [developers] try to deliver the minimum of what they need to do."

Local authorities mentioned that some housing accessibility features can be overlooked when accessible homes are built. They stated that for developers there is a disconnect between building the home, and who is actually going to live in it and how the choices they make will impact their day to day lives.

// I don't think there is a lack of knowledge. I think our contractors do know, I think they do try and skip things if they can get away with it. And we have certain projects where we're dealing with at the moment – where our door handles aren't in the zone of usability for someone in a wheelchair." (referring to wheelchair user homes being built)

// I don't really think they [developers] think about the impact of what they're delivering has on people necessarily. They're almost trying to – I mean I don't want to shortchange them – but it almost feels like they're trying to tick a box."

// Getting developers to understand how a design of something can really affect someone's life and the impact that makes is challenging. We've had cases within the borough, and I've heard of it elsewhere, where a developer says yeah, tick, I've delivered an accessible home and okay, the home itself is accessible. But then to get into the actual development, there's a big gate that actually people can't access on their own.

**How do things like that get slipped through the net in planning?
It's mainly because developers are just thinking about ticking
a box without actually thinking about the implications of what
they're building."**

There was a perception amongst local authorities that developers choose to cut corners when building new homes to reduce costs and increase their profit margin.

- // It'd be disingenuous for me to say all contractors do it, but they are all trying to take money. So, if they can get away with it sometimes, they would."**
- // That's what their biggest thing is, if they can get out of providing something extra, they will and then try and save money"**
- // A lot of developers and contractors will try and do the cheapest possible job."**

Some planning officers in local authorities acknowledged that they had limited understanding of accessibility standards. They reported that employing Occupational Therapists who can work closely with developers to monitor whether homes comply with accessible housing standards enable them to ensure homes are built to the highest possible accessibility standard.

- // Part M has lots of grey areas. And I'd have to say, if we didn't have someone like [our Occupational Therapist] in post, as you would expect any developer probably to do, they would just build out to the minimum standards to meet those part M requirements and where there are grey areas, they'll go to the as low as standard as they possibly can."**
- // They're trying to cut corners, and we just needed someone with a bit more understanding of the guidance, just to very singularly look at wheelchair units and go yep, that's fine. That's all how we'd expect it to be. That's the kind of subject standard of M4(3) and M4(2) units. It kind of achieves that, so we've got [our Occupational Therapist] in the role which has been really good... Even though I know the standards I might miss because I'm looking at everything and anything, whereas [our Occupational Therapist] is just going purely for wheelchair access and making sure that it works for people."**



Photo: Age Without Limits

Right kinds of homes

Local authorities expressed that whilst there are London Plan targets for the accessibility levels of new build homes, ensuring developers build the right kinds of homes can be challenging. This is because while developers might meet the 10% requirement for wheelchair user homes, these homes also need to be affordable, located in suitable areas, with accessible transport networks, and designed with the appropriate number of bedrooms to accommodate the specific needs of those who will live in them. However, many local authorities noted that developers often fail to deliver homes that truly meet local demand.

Family-sized homes

In particular, nearly all local authorities emphasized that it is very difficult to encourage developers to build family-sized wheelchair user housing. They often find that wheelchair users do not live alone and need a home that will also accommodate their family, carer or partner. However, due to the extra space required for M4(3) wheelchair user homes, developers may build the 10% requirement of wheelchair user homes as smaller one bed properties.

- // You might have a family with a Disabled child. So, lots and lots of one beds is not what we want but I suspect it's attractive to developers because they don't have to add so much space."**
- // Designers and contractors particularly try to maximize the number of small homes for M4(3). We've tried to get a better mix, try and avoid one beds. Just because there aren't that many people that have a wheelchair need that don't have either a partner or a carer".**
- // Nobody will ever really offer to build five or six [bedroom homes]. We have to adapt our own or as a council development team we might choose to do that. But no one will offer that. So, I'd say that is the biggest issue for us really at the moment."**
- // For all homes we need more family bedroom homes. We need it more for people in wheelchairs and with other disabilities as well. So, the kind of family housing is more important ... There are only limited tools you've got through planning to kind of force what developers deliver."**
- // Getting a private developer to develop larger properties, that, in itself is difficult, but then with larger wheelchair properties it is even more difficult."**

Wheelchair accessible homes M4(3)b

Another issue that was noted by local authorities was that developers will often opt to deliver M4(3)a wheelchair adaptable homes, rather than M4(3)b fully wheelchair accessible homes.

While M4(3)a homes are built to wheelchair adaptable standards which means it is possible to adapt their bathrooms and kitchens to make them fully accessible, they are not readily fully accessible for wheelchair users and need adaptations before they can move into a property like M4(3)b wheelchair accessible homes are.⁵

⁵ Individuals may have specific access requirements that go above M4(3)b specifications but generally an M4(3)b wheelchair user home should be accessible to an average wheelchair user.

Three councils specifically noted that developers choose to mainly build M4(3)a homes. This means that wheelchair user homes are built without fully-equipped bathrooms and kitchens. As a result, councils or individuals rather than developers bear the costs of adapting these homes to make them completely accessible.

- // Now there is a slight difficulty in that there is the 10% in terms of – you could either deliver a fully accessible home or you could deliver one that's adaptable and can be made fully accessible. And I think certainly in terms of what we get from developers offered, it's the latter... it can be adapted but it's not actually fully accessible at the time that we take handover, and then we've got the cost of adapting it."**
- // The developers will do M4(3) up to a point, but they don't really want to do M4(3)b, because they don't want to put extra stuff in."**

Adapting homes that could have been built to fully wheelchair accessible standards from the outset not only imposes extra costs for local authorities and national government. It also means that Disabled people who are unable to use kitchens and bathrooms in their homes have to endure a prolonged waiting period for the adaptations to be approved and installed, undergo means testing which could mean them having to supplement the grant themselves to make their home accessible, if they can afford it, whilst in the meantime being unable to cook or wash themselves.

Some people are not even able to access adaptations through Disabled Facilities Grant and crowdfund for adaptations they need due to the arbitrary nature of means-testing and the cap set at £30,000.³⁸

Viability assessments

Most local authorities noted that viability assessments represent a significant barrier to the delivery of accessible and affordable housing.

Currently, a large proportion of new affordable and accessible homes in England is delivered by private developers through Section 106 agreements (S106), also known as 'planning obligations'. S106 are a key feature of the planning system and are used by local authorities' planning departments to set certain conditions or financial contribution requirements that new

building developments have to meet in order to get planning permission. Through the S106 system, local authorities often require developers to build a certain proportion of affordable and accessible housing in residential developments.

However, developers tend to rely on viability assessments to challenge conditions imposed on them by planning authorities.³⁹ Viability assessments are appraisals of the amount of profit a developer can expect to make on a particular scheme. If the developers' expected profits are below 20%, developers can argue that their development proposal is no longer financially viable and that the only way to address unviability is to significantly reduce the number of affordable and accessible homes they are required to build under Section 106 agreements.⁴⁰ Because accessible homes tend to require more land and therefore cost more to build, Section 106 agreements are often renegotiated with local authorities to reduce costs for developers.⁴¹ Viability assessments are loopholes in the planning system that are therefore used by developers not only to squeeze the number of affordable homes required but also to escape their obligations to build homes of certain sizes as well as homes that meet certain quality and design standards.



Photo: Getty Images

There was consensus among local authorities we interviewed that developers tend to resist building accessible homes due to the impact this would have on the project's viability. Reasons developers provide include:

- **Increased building costs** – developers argue that building homes of larger sizes significantly increases their building costs because they require more land, and the cost of land makes projects unviable.
- **The need to balance other requirements** – developers argue that they need to balance other requirements, such as affordable working spaces, which results in them not prioritising accessible homes.

“They have to balance out all the other social infrastructure they are being asked to provide alongside housing to make a profit and, effectively, providing slightly larger homes from M4(3) is in that mix.”

“Viability is an issue now and when you're trying to deliver as many affordable homes as you can, with decreasing amount of land available and increasing building costs and everything else [...] the kind of additional cost of delivering a fully accessible home. It is quite significant... When private developers are coming forward, that is one of the things that they argue in terms of viability of build.”

This reflects findings from the Equality and Human Rights Commission in 2018 which suggested that viability assessments act as a barrier to building accessible homes.⁴²

Local authorities' skills and capacity

Our research confirms existing research suggesting that local authorities sometimes lack capacity and skills to challenge developers' viability arguments due to the technical nature of these appraisals and that they are also unable to enforce accessible housing standards and targets to ensure homes are built to the appropriate standards.

Enforcement of targets

A key theme that emerged during the interview was that, for various reasons, it is challenging for local authorities to enforce compliance with

accessibility targets. This included enforcement from private inspectors and local authorities themselves.

- “We really don’t know what gets delivered. In a sense we are in the hands of building inspectors, most of whom are not *our* building inspectors.”
- “I don’t know whether there’s more that could be done by either national government or the GLA to enforce what is delivered because I know from looking at the stats on the number of M4 homes that have been delivered that, across London, we’re way below the targets both in what has achieved planning permission and what has actually been delivered.”

Local authorities felt that they had little oversight on how well developers actually interpreted Part M of the Building Regulations.

- “It’s easier when we’re building something and we’re delivering our own homes [...] because we’ve got control over what is delivered. But when it’s a private developer who’s just delivering homes in the borough, you’ve got less control other than through planning.”
- “Also, how actually rigorous they [developers] are in applying the Building Regulations themselves, having worked out what they’re supposed to do in terms of [planning] conditions.”

BEST PRACTICE EXAMPLE

This finding highlighted the need for inclusive design and accessibility to be embedded into the whole housing development process.

Hammersmith and Fulham’s Inclusive Design Review Panel (IDRP) is a best practice example of this. DFPG is a user-led group of Disabled residents, who use the social model of disability to advise the local planning authority on development proposals and actively challenge proposals that fall short of accessibility standards. Their engagement extends to commissioning inclusive training for residents and planning officers.

Skills and capacity

Local authorities mentioned lacking the time and skills to inspect properties that are built by developers to ensure they comply with the Building Regulations standards they claim to be.

- “We don’t know. We really don’t have resources to go around inspecting properties and see what’s been done.”

Additionally, local authorities noted that unless S106 agreements specify in granular detail what conditions have to be met by developers, developers are more likely to cut corners to cut back on costs. Developers often push back on certain requirements and exploit loopholes in the planning system. If there are no staff to make sure developers do not take advantage of grey areas, they are often overlooked.

Design

Local authorities expressed that even when developers do meet the minimum accessibility requirements to meet Part M of the Building Regulations, sometimes the accessibility specifications are inadequate.

- “I have definitely seen M4(3) homes, particularly in private blocks, whether it’s their lift, for example, or they haven’t thought about access to the home.”

Specifically, local authorities told us that the current Building Regulations for accessible homes do not support the delivery of homes which are fully accessible for people with non-mobility related impairments.

- “Because of the way the building regulations work, we are quite focused on wheelchair users. Because that’s what M4(3) is all about really.”
- “I think the area we have most difficulty with probably is housing for people with mental health needs.”
- “Trouble is part M is very wheelchair user focused.”
- “One of the issues we have is suitable accommodation for families with children with autism. One of the things that doesn’t work with

those families is the combined kitchen living room. Because if you've got a child with autism, the kitchen is dangerous. You need to shut a door. I've argued with colleagues on the development side who say: everybody wants to combine the kitchen with the living room. Everybody doesn't. There are certain groups of people for whom that's a huge problem."

Someone tells me they're providing M4(2)s and M4(3) and in my head it will always go – it's a wheelchair unit. I won't be thinking about any other disability."

One local authority observed that the exclusive focus on mobility impairments and wheelchair users in the current Building Regulations 2010 means that, instead of designing fully inclusive new homes, inclusive design features have to be incorporated at later stage. Adaptations have to be made for tenants with non-mobility related impairments only once they have moved into the properties, leading to inefficiencies and wasted resources.

We can't put everything in a building, I get that. But I suppose it's all about future-proofing buildings. So, for all of those people with other impairments, are there specific things that we could put in which actually won't cost that much like showing we have some conduit in for certain wire frameworks or like for the hearing systems around the building or the light, the light flashing for people who are deaf? All that kind of stuff, should we be thinking about that?"

USEFUL RESOURCE

The Inclusive Design Guidance created by the Centre for Accessible Environments is aimed at everyone engaged in the delivery of building projects, provides guidance on how to build homes to Part M of the Building Regulations effectively. It also provides further guidance, where the Building Regulations are unclear, to address common misunderstandings and missing details.

The book provides guidance on further inclusive design aspects which can be incorporated into building design, including on accessible lighting which is not currently in Part M of the Building Regulations.



5. Housing affordability barriers and the impact on Deaf and Disabled Londoners' lives



Introduction

Nationally, there is a chronic shortage of social rent housing, with demand significantly outstripping supply. Over the last 10 years, there has been a drastic decline in the delivery of new social rent homes and a net loss of 260,000 social rent homes.⁴³ While the need to build more genuinely affordable homes and retain homes in the social rented sector in order to meet demand has been widely recognised, the supply of social housing continues to be inadequate to address the housing needs of Deaf and Disabled people. In England 152,010 Disabled households are currently on social housing waiting lists, of which 23,397 are in London.⁴⁴

Deaf and Disabled people are disproportionately impacted by the housing crisis because they are more likely to be living in poverty and have a greater need for socially rented accessible homes than non-disabled people due to the affordability and security this tenure provides.⁴⁵ Poverty rates for Disabled people are shockingly high, partly due to the additional costs associated with their impairments or conditions and partly due to the barriers to work they face.⁴⁶ The median pay for Disabled people in the UK is still lower than non-disabled employees, with a 12.7% disability pay gap.⁴⁷ In an analysis of the impacts of increased costs of living between July to October 2023, ONS found that Disabled adults, particularly those who are renting, were more likely to say they were unable to save money or that they are finding it difficult to pay their housing costs.⁴⁸ These are worrying statistics, but they are unsurprising because it costs more to be Disabled. Scope in their latest Disability Price Tag report estimated that Disabled households need an additional £1010 a month to have the same standard of living as non-Disabled households.⁴⁹

In London the effects of the housing crisis are even more severe due to housing costs being significantly higher than anywhere else in the rest of England and the UK. Low-income households in London across different tenures are struggling to cope with the affordability crisis and are being forced to cut back on essentials and taking on further debt.⁵⁰

While the impact of unaffordable housing on Londoners' quality of life has been widely acknowledged, the specific consequences of London's housing emergency on Deaf and Disabled Londoners' physical and mental health have not been specifically explored, despite the high levels of poverty among Deaf and Disabled people.

Trust for London found that 30% of families in London that include a Disabled person are in poverty, compared to 22% for those that do not contain a Disabled person.⁵¹ Recent statistics from the ONS also show that 53% of Disabled Londoners who have a mortgage or are renting, find it difficult to afford their housing costs, the highest rate of any region and compared to 44% of non-disabled Londoners.⁵² We are alarmed that the shortage of accessible socially rented homes in the capital is forcing more Deaf and Disabled Londoners into temporary accommodation and the private rented sector where rents are spiralling out of control, leading to a rise in poverty and inequalities.

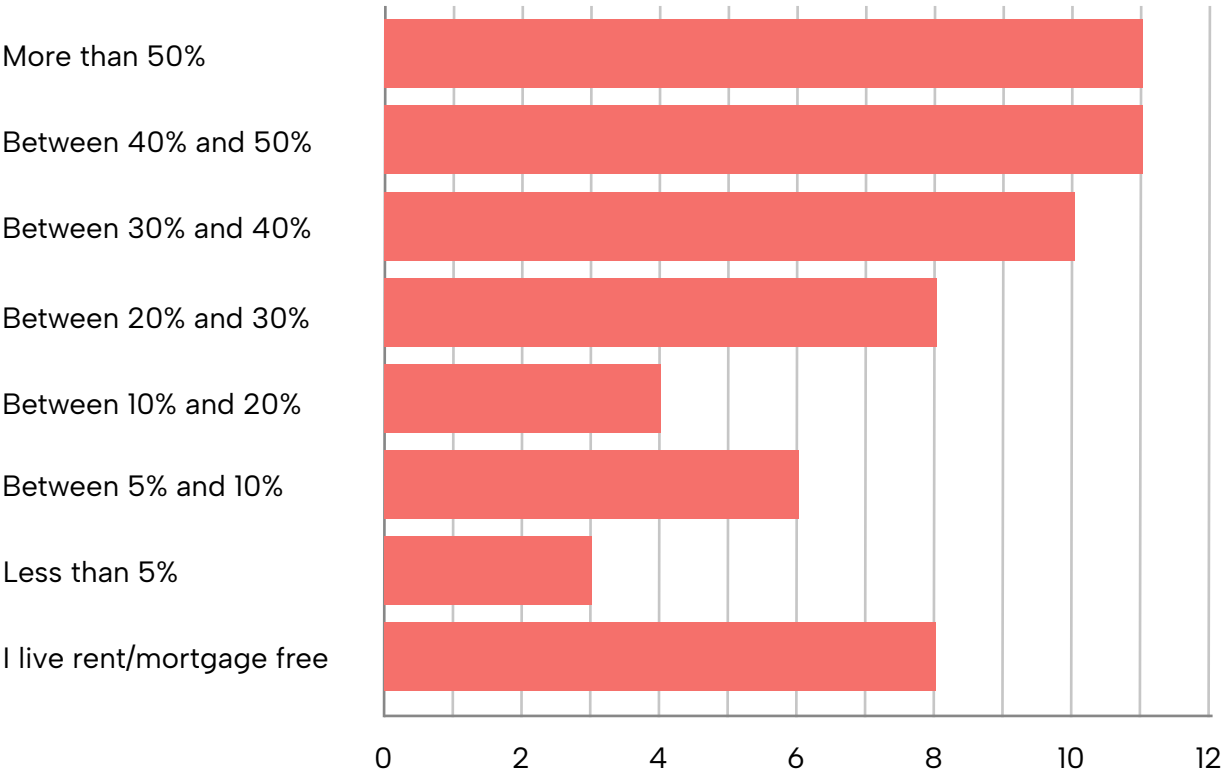
Given the significant numbers of Disabled Londoners who are on social housing waiting lists and the need to increase the supply of social rent housing to meet their housing needs in the capital, our research aimed to investigate the specific affordability challenges Deaf and Disabled people experience across all tenures in London in parallel with accessibility issues. This chapter explores the connection between affordability and health inequalities and the impact of unaffordable housing on Disabled people’s quality of life. We report an analysis of findings collected through our housing and disability survey and insights from our qualitative interviews with Deaf and Disabled people.



Photo: Age Without Limits

Affordability challenges

Portion of income (whole dataset)



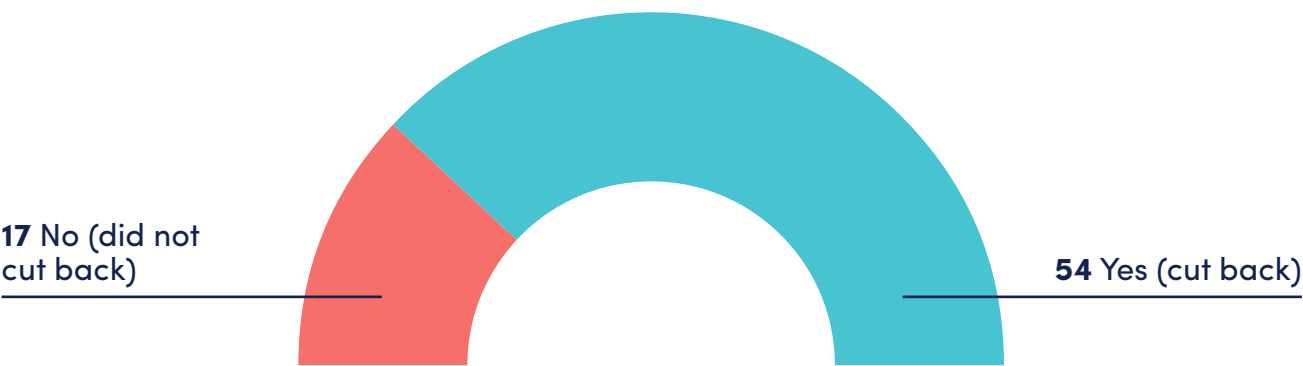
61 out of 84 respondents answered the question ‘What proportion of your net total household income goes to paying your rent/mortgage/loan (including any service charges you may pay).’

Of these 61 respondents, over half said they spent more than 30% of their total monthly income on rent or mortgage. It is widely recognised that affordable rent is less than 30% of a person’s income, including by the ONS.⁵³

Additionally, roughly 1 in 6 respondents to this question told us that they were spending more than 50% of their income on rent or mortgage. Spending such a high portion of income on housing costs may leave little room for other essential expenses or recreational expenses.

Cutting back

Have you or any other members of your household had to cut back on spending in any areas of your life in order to pay for your rent/mortgage/loan?

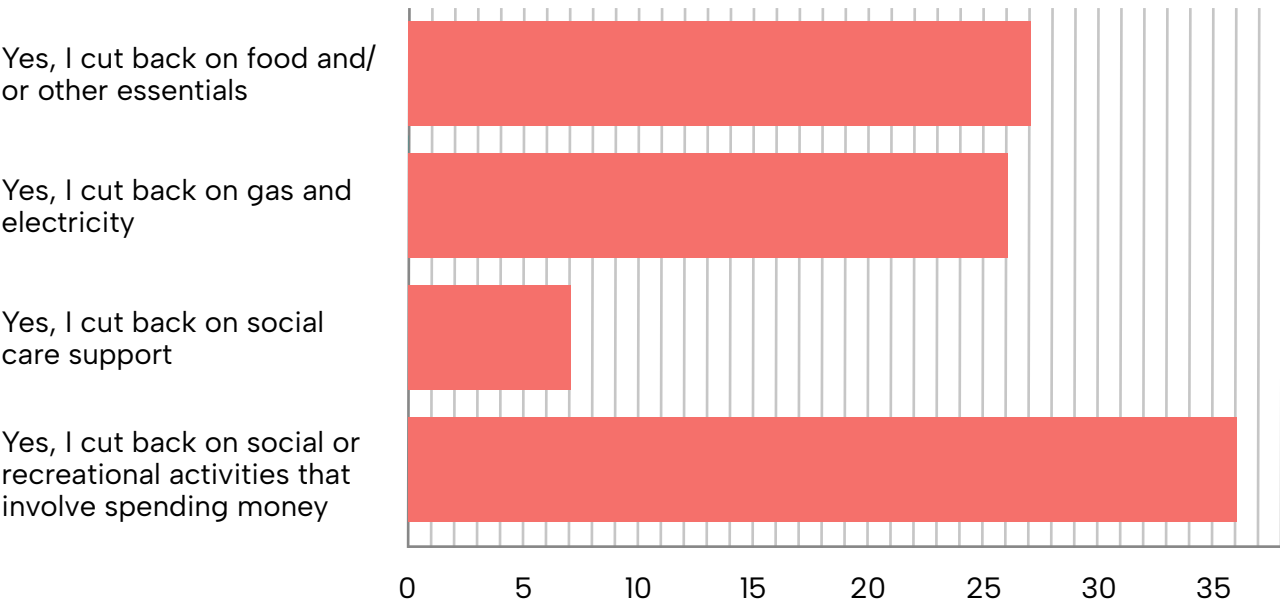


The above pie chart illustrates the amount of people who stated that they had to cut back on something to afford their housing costs.

Overall, we can observe that a much larger proportion of respondents told us they had to cut back on something to afford their housing costs than those who did not.

Nearly two thirds of respondents reported they had to cut back on something to afford their housing costs.

What did individuals cut back on to afford their housing costs?



We also asked respondents what they had to cut back on to afford their housing costs.

Of the entire dataset (84 respondents):

- Roughly **1 in 2 people** said that they had to cut back on social or recreational activities that involve spending money to afford housing costs.
- **1 in 3 respondents** said that they had to cut back on food and/or other essentials to afford housing costs.
- **1 in 3 respondents** said that they had to cut back on gas and electricity to afford housing costs.

Mental health and cutting back

Respondents who selected that they had a mental health impairment were more likely to cut back across all areas than those who did not. The link between financial hardship and living with a mental health condition is also reflected in wider existing research. The Joseph Rowntree Foundation’s UK Poverty Report 2024 found that nearly half of all people who were Disabled and living in poverty had a long-term, limiting mental health support needs (around 2.3 million people in the UK).⁵⁴ The poverty rate for this group was 38%, compared with 31% for people with another type of impairment. In their cost-of-living tracker they also found that 86% of households in the lowest fifth of incomes with a person with a mental health impairment type were going without the essentials, compared with 77% of those low-income households with a person with a physical impairment type.

Employment and cutting back

We also found that being in work (including part-time) had no substantial impact on whether or not someone reported that they had to cut back on certain costs to afford their housing costs. This suggests that being employed does not necessarily increase the likelihood of being able to afford housing costs without cutting down on day-to-day spending.

Reasons for unaffordability

Of the 22 case study interviews conducted, 15 respondents shared experiences of living in homes they could not afford.

The main aspects of housing that people mentioned as being unaffordable were:

Cost of being Disabled

Respondents expressed that being Disabled can mean housing costs are more expensive due to having to run equipment or have the heating on to stay warm because of to their impairments. They felt this adds a financial burden on them, which makes housing costs even more unaffordable than they would be for a non-disabled person.

These findings echo recent research by Scope, showing that Disabled people often need to spend more on everyday items. This includes spending more on specific food, utilities and transport to manage their conditions.⁵⁵

“Affordable” tenures

Three interviewees specifically criticised the affordable housing tenures currently present in London, such as the London Affordable Rent. They felt these tenures are out of reach for Disabled people, including those earning average incomes. At the same time, they mentioned they struggle to access truly affordable social rent housing.

“I don’t work anymore, I’m ill-health retired, my husband does work, but he doesn’t earn a lot. So the places that were coming up was this new affordable rent and it was just too much, we just couldn’t afford it.”

Sarah

“And I looked at the London living rent, and most of them, you have to be on £50,000. I earn less than that. And you think, I can’t even get something that is something like London living rent. I can’t rent a one bed.”

Paris

Service charges

Respondents highlighted service charges as making their living costs unaffordable.

“No, I’m in agony. You’re making my disability worse, yet you’re happy to take the rent quickly and put up the service charges constantly.”

Sarah

Rent increases

Disabled private renters and social housing tenants shared that they are fearful of facing rent increases and expressed concerns about the impact this would have on them being able to afford their housing costs.

“So, there is a big issue for me at the moment because I don’t know how from April, I’m going to afford to pay 7.7% more and plus they increase in council tax as well which is just insane.”

Corinne

“The rent has just gone up, which has angered me because there’s damp and mould... Everything has just gone up in price, your rent’s gone up. Your wage hasn’t gone up.”

Paris

CASE STUDY

Cassie

Housing affordability

Cassie is a young professional who has lived in 4 private rented homes in London. Speaking of her experience, Cassie said: **“I’ve lived in one accessible house and the only good thing about it was that it was accessible. Everything else about it was awful”.**

To rent privately, Cassie had to provide evidence that she could afford the rent:

“A lot of people have like parental support, and I don’t have anything like that. [It] was rough trying to find places to live and being like, I

promise I can afford the rent without really any evidence you can afford it. And then being Disabled on top of that where your cost-of-living costs more.”

Cassie said that being Disabled makes it more difficult for them to afford rent, **“If I’ve had like a bad time with my health, affording my rent becomes harder...”**

“The moment something goes wrong with my wheelchair, oh that’s a thousand pounds. The moment something goes wrong with my health and it can’t be done on the NHS, oh that’s infinite amounts of money.”

In particular, Cassie spoke about the extra housing costs associated with being Disabled:

“The increase in electricity bills that just comes with being Disabled because you have to charge lots of devices and hot water bottles and heating pads.”

Finally, Cassie explained the disabling impact of having to cut back on things to afford housing costs.

“Your ability to ration things is different compared to others [...] people being like oh just take 2 showers a week and ration your water [...] but that’s not really possible. Rationing it would have a bigger issue on your health which would then in the long-term cost more”

3 out of the 22 people we interviewed shared that they had gone into debt due to housing costs, including energy bills and rent arrears. They expressed that this had caused them a great deal of stress and that, despite working as many hours as was possible for them, they were just unable to afford their housing costs.

Impact of living in unaffordable housing

Through our qualitative interviews, we explored the impact that living in an unaffordable home has on Deaf and Disabled people’s lives.

Physical health

Interviewees shared that in order to afford their housing costs they had to cut back on certain essentials, such as physical therapies and heating. This highlights the disabling effect of living in unaffordable housing, with Disabled individuals being forced to make difficult financial choices that impact their physical health.

Cutting back on activities

Some of the individuals we spoke to told us that they used to take part in certain activities, often prescribed by a doctor, to improve or manage their impairments or the pain they experienced. However, with the rise in housing costs, they are now unable to continue doing these activities. This impacts not only their overall well-being, but also their ability to manage their health.

“All these things that I’ve got in my plan with my physios and stuff that are really beneficial for me, I’ve just had to cut some of them out because I’m like – I just can’t, especially when all those care costs were coming in as well.”

Sarah

“And sometimes I do things like Pilates, for my joints – I can’t, I’ve had to cut back because the rent has gone up, that’s a £75 increase.”

Paris

Heating

Whilst a number of the respondents who live in social housing told us that their actual rent is affordable as it is paid by housing benefit, they struggle to pay for utility costs.

For many Disabled people, maintaining a certain body temperature is very important for their health. However, due to increased heating costs, respondents reported that they had to cut back on heating as they could not afford it. This causes them to experience more pain and discomfort than they otherwise would.

CASE STUDY

Lizzie
Housing affordability

// We're in debt with our energy company because [...] I don't want my muscles to seize up or my bones to lock in place and cold makes things really difficult."

Lizzie is a Disabled person who lives in a housing association property. The recent increase in gas and electricity costs have had a massive impact on Lizzie and her family. **"Since the price of gas and electric has gone up, it's become impossible to keep within what we can afford really."**

Speaking of why warmth is extremely important for her, Lizzie said **"I get a lot of pain, cold makes the pain worse, quite significantly. There is no insulation in our house whatsoever, like we have single pane windows and they're the ones that sort of lift up. So there's always air coming in."**

Her energy provider now demands £300 a month but Lizzie says **"if we pay £300 per month, we can't afford food, so we pay as much as we can."**

Lizzie has tried to get the costs down: **"we actually had our radiators removed so that they don't cost us money. We just have electric heaters in a couple of the rooms so we try to have them on the minimum amount but we still need to use them."**

Lizzie said that she has been in contact with her energy company who asked her to complete an income and expenditure form, **"which took a really long time. And then since then, I think I've had to do it like 3 more times for the last few months."** However, Lizzie says, that this

hasn't helped: **"the debt just builds up [...] even though we're paying as much as we possibly can."**

This constant cycle of debt for Lizzie and her family, has meant her energy company passing her case onto a debt collection agency. **"So it's a bit scary and I've not had that kind of experience before so it does worry me."**

The financial strain has forced Lizzie and her family to cut back on many aspects of their lives: **"me and my husband once a month we used to go on like date night and it was nothing like overly expensive, we'd go to the cinema."**

It has also impacted what they can spend on essential items. **"It's just difficult, you're always constantly worried, you're always thinking – can we afford to get the name brand of this cereal that our son really likes? It's just those constant decisions that you have to make."**

According to a 2023 Research note by the GLA, 54,622 homes in London are hazardous due to being excessively cold. Repairing homes which are excessively cold in London would save the NHS £40,548,204 annually.⁵⁶



Photo: Age Without Limits

Mental Health

Seven individuals shared experiences of the negative impact on their mental health of being unable to afford their housing costs.

Anxiety

Anxiety and worry were commonly reported by individuals who found their housing costs unaffordable. Respondents expressed that they had experienced mental distress due to their housing costs, whether that be due to being in debt or having to make difficult decisions about what they can and cannot afford.

I feel that practically half my money's gone on bills and rent. I'm just so fed up."
Almarie

It starts to worry me that the landlord just told me that we're going to be charged for water rates."
Robert K

Reduced quality of life

Respondents also reported that the stress and anxiety of their housing costs mean they are unable to focus on other things or enjoy other aspects of their lives, such as social activities as they cannot not afford them. They felt that if their housing costs were lower, they would have more money to spend on things which would improve their well-being.

I find reading really helps me, [before] I could maybe buy three books a month, now I can only buy one book a month, but that is like my time where I don't think of my housing, because it's my head in the book."
Paris

I don't go out socialising as much as I used to. Which is a shame, especially when you're housebound for some periods of time. It's so important to go out and see people and socialise with your friends and just get out of your environment."
Corinne

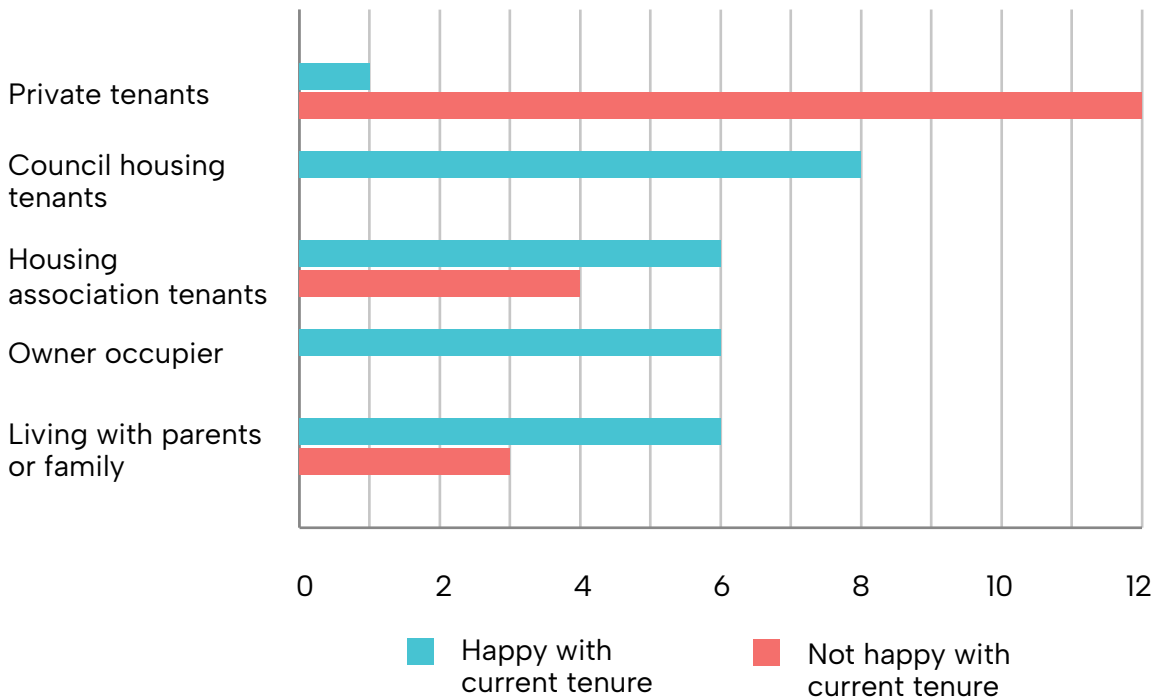
Tenure satisfaction

During our research, we investigated potential correlations between the tenure type individuals live in and the impact this has on their housing experiences. We asked respondents a series of questions that aimed to explore the link between:

- people's current tenure type and their actual and perceived ability to afford their housing costs;
- people's current tenure type and their actual and perceived feeling of being able to live in their home long-term.

We use the term security of tenure to refer to the feeling of being able to live in a home long-term.

Tenure Satisfaction



The above graph illustrates respondents' satisfaction with their current housing tenure across different tenure types.

From the graph it can be observed that those currently living in the private rented sector were the only respondents who were more likely to be

dissatisfied than satisfied with their current tenure. In fact, only one private tenant stated they were happy with the tenure they were living in.

All the respondents who currently live in council housing or own their own home stated they were happy with their current tenure. Notably, however, 4 out of 10 housing association tenants selected that they were unhappy with their current tenure.

During the case study interviews, issues with housing associations were frequently mentioned by respondents. The issues were primarily related to poor communication and inadequate support for Deaf and Disabled residents.

Housing Association, the rent, I think it's just too expensive, and it's a rubbish service. Why is rent expensive when it's just rubbish? It's not fit for purpose. The communication is terrible, it's not helpful. I'd prefer a council property."
Almarie

Lack of communication

Interviewees shared frustrations around having to repeatedly contact their housing associations and receiving delayed responses. Some tenants shared that when contacting their housing associations to report disrepair, make complaints about issues with neighbours and/or request housing adaptations, they never hear back from their housing associations or wait years for a response. Respondents also added they struggle to maintain a consistent line of communication with their landlords, an issue they believe to be compounded by the constant staff turnover within housing associations.

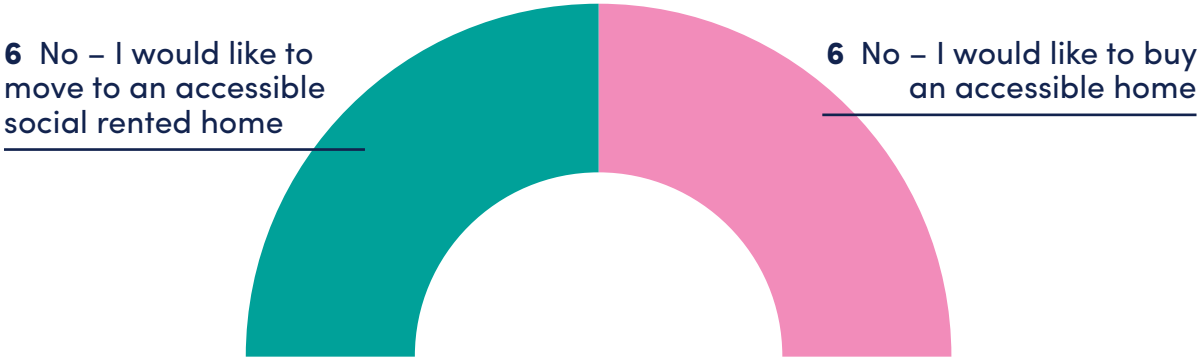
Support for Deaf and Disabled Tenants

Interviewees felt that there is not enough support for Deaf and Disabled tenants. This includes no reasonable adjustments being made by housing providers for Deaf tenants in terms of communication and a lack of consultation with Deaf and Disabled residents. Individuals said housing association do not sufficiently understand the specific access requirements of Deaf and Disabled tenants.

Sometimes I feel like I am lucky that I am protected by having a housing association property in that I can't just get chucked out at any time like a private landlord could do to someone, but then also I don't feel protected with my disability in the way that they have treated me and ignored so many problems that are going on with the block and everything and my safety."
Sarah

Private tenants

Preferred tenure (private tenants)

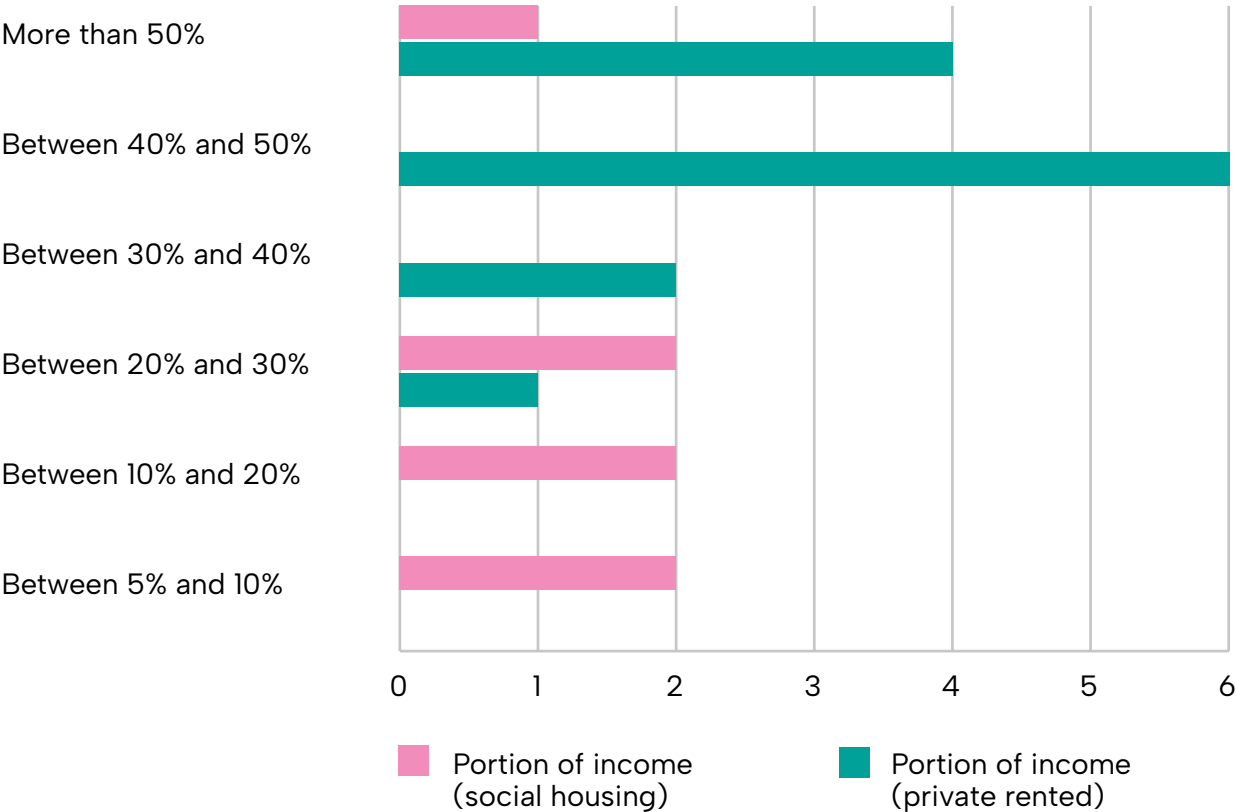


Of those private tenants who selected they would like to live in a different tenure to the one they were currently living in, half said they would like to live in social housing (6 out of 12) while the other half would prefer to own their own home (6 out of 12) instead.

I can't access social housing. I can't afford private renting. If I want peace in life that comes from buying, if I could do anything, it would be social housing, but we just don't have enough in this country and we're not building enough and it's not a priority."
Paris

In general, the private rented sector offers less security and rights than other tenure types. Additionally, social rents in England are significantly more affordable than private rents, particularly in London. Recent research from Shelter (2024) found that private renters in London would be, on average, more than £1400 a month better off if they could move from the private sector to the social rented sector.⁵⁷ Therefore, it is unsurprising that our findings indicate a trend in private rented tenants being unhappy with their tenure type and wanting to move to more secure and affordable tenures.

Portion of income tenure comparison



The above graph compares responses from private tenants to council tenants of how much of their income they spend on rent.

While direct comparisons are somewhat limited due to varying response rates, we can however acknowledge trends in rent costs amongst different tenures based on people’s incomes.

We can see none of those private renters, who responded to this question, stated that they spend less than 20% of their income on rent. On the other hand, over half of the council tenants who responded to this question stated they spend less than 20% of their income on rent.

Impact of tenure insecurity

Throughout our interviews, a common theme was security of tenure. This refers to the feeling individuals have of being able to live in their homes long-term.

Several participants stated that the security of their tenure type was crucial for them and positively impacted their overall well-being. This is due to having a reliable foundation from which to live their lives from. This was often expressed by those who owned their own homes or were social housing tenants. Below we report an analysis of key themes that emerged in our interviews when discussing the implications of security of their tenure or lack thereof on people’s physical and mental health.

Social housing tenants and owner-occupiers

Stability

Interviewees shared that living without the fear of being evicted provides them with a sense of safety and stability which allows them to focus on their day-to-day lives. Individuals reported that whilst already dealing with complications related to their impairments, not having to fear suddenly losing their homes is very important for them.

When your mental health is down the toilet and your physical health is not good either, having to worry and stress about paying bills and rent and can I be kicked out at last minute because they want somebody else paying more rent, all that is taken away. So, I am grateful for that.”
Corinne

Community

Individuals stated that the security of their tenure allows them to set down roots in an area by building relationships with neighbours and participating in their local community, and added this sense of community generally improves their well-being. Alternatively, they acknowledged that private

renters often have to move regularly due to rent increases or evictions which can lead to isolation from their local community.

“ Security allows you to form a community. To be a part of this network that is close by. In private accommodation, because the landlord can change rules whenever they want to, they force people to keep moving and that’s basically unhealthy. Community brings health and we need the community to stay strong.”

Gemma

Ability to focus on health

Respondents shared that not having to be concerned with regularly searching for new places to live, or fearing their housing situation suddenly changing, allowed them to focus on their health and well-being. For instance, learning more about their impairments and how to manage them.

“ The security of tenure allows me to just relax a little bit, so my blood pressure goes down. Things like Section 21 don’t exist to me, it would scare me beyond belief. I don’t know how certain people cope with it. I’m very lucky to be totally carefree because my condition is stress-based.”

Adam



Photo: Age Without Limits

Private Renters

Insecurity

Security of tenure is a key driver of the historical overrepresentation of Disabled people in the social housing sector.⁵⁸ However, with the progressive loss of social rent homes and the decline in delivery of new genuinely affordable homes in London, increasing numbers of Disabled people are being forced to live in the private rented sector. Throughout the interviews, it was clear that interviewees living in the private rented sector felt the least secure in their homes.

“ You’ve just got no secure rights as a private renter.”

Paris

Regularly moving home

Of the private renters we spoke to, some individuals reported having to move homes frequently. They shared that having to move around very often made it difficult for them to access health treatments which were only available in certain London boroughs. They added that the process of moving home can also be extremely inaccessible due to having to move lots of equipment.

“ I’ve had to keep moving doctors and hospitals because we kept moving around all of London... the NHS does not expect you to move borough as often as I have.”

Abbi

“ This is my fourth London home since 2019. I’ve private rented all of them.

“Even then when you do get somewhere, you have to move. And it’s like, well, we have to pay for movers now. I can’t really pack up boxes. I can’t really carry heavy stuff. It’s really heavy and then trusting people to move that for you and you’re like, I need that to make it safely, for me, that’s my wheelchair and my crutches and my power attachments.”

Cassie

Adaptations

Individuals living in the private rented sector reported being fearful of asking for adaptations due to the threat of eviction. They felt that there is a large power imbalance with their landlords which means they struggle to obtain the accessibility features they need in their homes, leading to their accessibility requirements not being met.

Our findings confirm existing research findings, suggesting that there are significant barriers to requesting and installing adaptations in the private rented sector and that funding available through the Disabled Facilities Grants (DFG) is rarely taken up. Whilst 18.8% of Disabled people live in the private rented sector, only 6% of Disabled Facilities Grants go to private renters.⁵⁹

Mental health

Respondents reported that living in insecure tenures, such as the private rented sector increased their anxiety because they do not feel they can live in their homes long-term. They expressed worries about the possibility of being served section 21 no fault eviction notices at any time and shared the negative impact this has on their mental health.



Photo: Age Without Limits

// Your body is in constant flight or flight mode, and I feel that, my body's like okay when are we going to get evicted."
Paris

Research conducted by Shelter in 2017 found that GPs link insecurity of tenures as a key issue impacting their patient's health.⁶⁰

CASE STUDY Abbi Insecurity of tenure

// You're in such a weak position as a renter, I've never wanted to rock the boat at all."

Abbi is a young professional who is a wheelchair user and is hard of hearing. She has lived in London for 9 years in a number of different private rented homes.

"I've lived in 5 different homes in London, and the experience of finding all of them has been awful, every single one, except one, which we found by accident, and this, the one I'm in now."

Abbi was evicted from a previous property through a Section 21 eviction notice. **"We've been evicted before, a no-fault eviction from the only accessible flat that we ever found."**

This meant that Abbi and her flatmates had to search for a new accessible flat to live in, which was extremely difficult:

"I think the main problems are the difficulty of finding any information about access on rental websites, especially on Spare Room. It was just so hard to find details about them (accessibility details about private rental properties)."

"I got the feeling that I needed to not tell people that I was a wheelchair user until I'd got a date to go and see the property because it felt for a while that as soon as you say "wheelchair", they stopped talking to you, especially on Spare Room."

This process had a significant impact on Abbi's mental health. **"I got really mentally ill, because we were going to so many places, we just couldn't find anywhere. I was nearly hospitalised and I was only not hospitalised because the psychiatric team I was under at the time felt that I needed to be out of hospital so I could work on finding a flat."**

Eventually, Abbi and her flatmates found a property that was partially accessible to her. However, Abbi says that she is fearful of losing her tenancy: **"you're in such a weak position as a renter that you don't, I've never wanted to rock the boat at all."**

Whilst Abbi's current property is not completely accessible, she unlikely to ask for adaptations:

"I don't feel confident asking my landlord to make adaptations but there are lots of adaptations that would be relatively easy to make. I know it might sound insane like why don't you just ask? But I just don't ever want to be evicted again".

"I ought to really have a flashing fire alarm, because if I'm asleep, when I take my hearing aids out, I don't think I'd be able to hear the fire alarm, but I've just never even really considered doing anything about that, well I do consider it but I just don't do anything about it because I just don't want, I don't want to give them any reason to evict us."

Impact of living in HMOs and Temporary Accommodation

House share



4 interviewees told us that house sharing was inaccessible for them

Due to rising rents in the private rented sector, there has been an increased trend in Londoners moving to shared accommodation to save housing costs, also known as HMOs (Houses in Multiple Occupation).⁶¹ This can include moving in with friends or moving into a house share which was advertised on online house sharing websites such as Spare room.

Four interviewees recognised that they cannot afford to live on their own and that sharing accommodation in London is the only available option they can afford to live in the capital. However, they acknowledged that this type of accommodation is not suitable to their needs. The main reasons they cited for this were the process of flat hunting, the lack of accessibility features in the private rented sector and the inaccessible nature of shared accommodation.

Discrimination in the house search process

Several individuals cited prejudice and discrimination as a significant barrier they faced during the process of looking for a shared accommodation in London. They reported facing both disability and race discrimination from landlords and tenants.

Some individuals reported feeling they cannot disclose their impairment before property viewings as landlords or housemates can become unresponsive when it was mentioned. When attending viewings, individuals found that asking existing tenants about access within the home is met with hostility and leads to them being rejected as potential housemates. Interviewees also shared, that when viewing shared houses, they feel they

have to prove they fit into the ‘vibe’ of the house. This can include things, such as partying, which are inaccessible for them.

// **The first house I looked at in London in 2019 I used crutches at the time, and I asked them if I could go into the bathroom to look at how high the bath was to step into, and they said that was one of the reasons they didn’t want to take me.”**

Cassie

// **I got the feeling that I needed to not tell people that I was a wheelchair user until I’d got a date to go and see the property because it felt for a while that as soon as you say wheelchair they stopped talking to you, especially on Spare Room.”**

Abbi

// **I noticed that I wasn’t getting responses on Spare Room, and I thought this is weird because, yes, it’s expensive, but I’m seeing other people get rooms very easily.”**

Paris

Lack of accessible house-shares

Another factor that was mentioned was that the majority of shared flats they view or see online are just not physically accessible. This includes inaccessible bathrooms, lack of level access and lack of lifts.

// **Any house share that I ever saw wasn’t accessible.”**

Sam

Inaccessible nature of house-sharing

Beyond the physical inaccessibility of house-sharing, individuals also found that the social expectations and dynamics of this type of accommodation make it inaccessible for them. Some shared households consist of individuals with very different lifestyles, which can pose challenges for Disabled people’s accessibility needs. Neurodivergent individuals pointed out that having to adjust to other tenants’ routines often destabilise their own, making it extremely difficult to maintain their well-being.

Interviewees also mentioned that noise is a persistent issue in shared accommodation, due to other tenants playing loud music or staying up late. This disrupts sleep and was particularly inaccessible for those sensitive to noise. Additionally, some reported that their medical equipment produces noise, which frustrates other tenants and leads to inharmonious living environments, which negatively impact on their well-being.

Therefore, they told us that living in house shares was inaccessible for them, but they could not afford to live on their own.

CASE STUDY
Paris
House share

Paris is a young professional living in a HMO (House in Multiple Occupation).

“I’ve never really suffered with depression or anxiety but I think having to live in an HMO has really at times sent me to rock bottom.”

In particular, Paris told us that sticking to a routine is very important for her, but, living with housemates with varying schedules, this is very difficult. **“I thrive with a routine, and I don’t have a routine in that flat.”**

She typically showers at 8:30 PM, but with multiple housemates on varying schedules, she often cannot shower when she wants to. This disruption leads to unnecessary stress, as she shares, **“so then I have to rejig my routine and then I sit and think about having a shower. And I don’t think that’s particularly healthy to sit and think well can I go for a shower yet.”**

Noise levels associated with the differing life schedules in her flat also complicate Paris’ ability to sleep **“sometimes I don’t get to sleep till 3 a.m. because my sleep cycle is out of whack.”**

Paris has said that living in a HMO impacts her ability to work. **“Sometimes I think, how am I even productive at work? Because my head is that consumed with, okay, what is the day gonna look like?”**

Paris wants to live in a home on her own but says, **“you can’t find a warm bed anymore that is affordable. I can’t access social housing.**

I can't afford private renting. If I want peace in life that comes from buying.... So I thought let me look at getting a mortgage because renting is hell. Even then trying to buy is no easier. It is expensive"

Paris expresses a strong preference for social housing, saying, "if I could do anything, it would be social housing, but we just don't have enough in this country and we're not building enough and it's not a priority." At 25, she is not interested in home ownership due to the associated stress and responsibility, yet she finds herself stuck in a challenging rental market that offers little in the way of affordable, suitable options.

"It's only since I've started my most recent job that I actually have enough money to maybe think about saving.

"And I looked at the London living rent, and most of them, you have to be on £50,000. I earn less than that.

"And you think, I can't even get something that is something like London living rent. I can't rent a one bed."

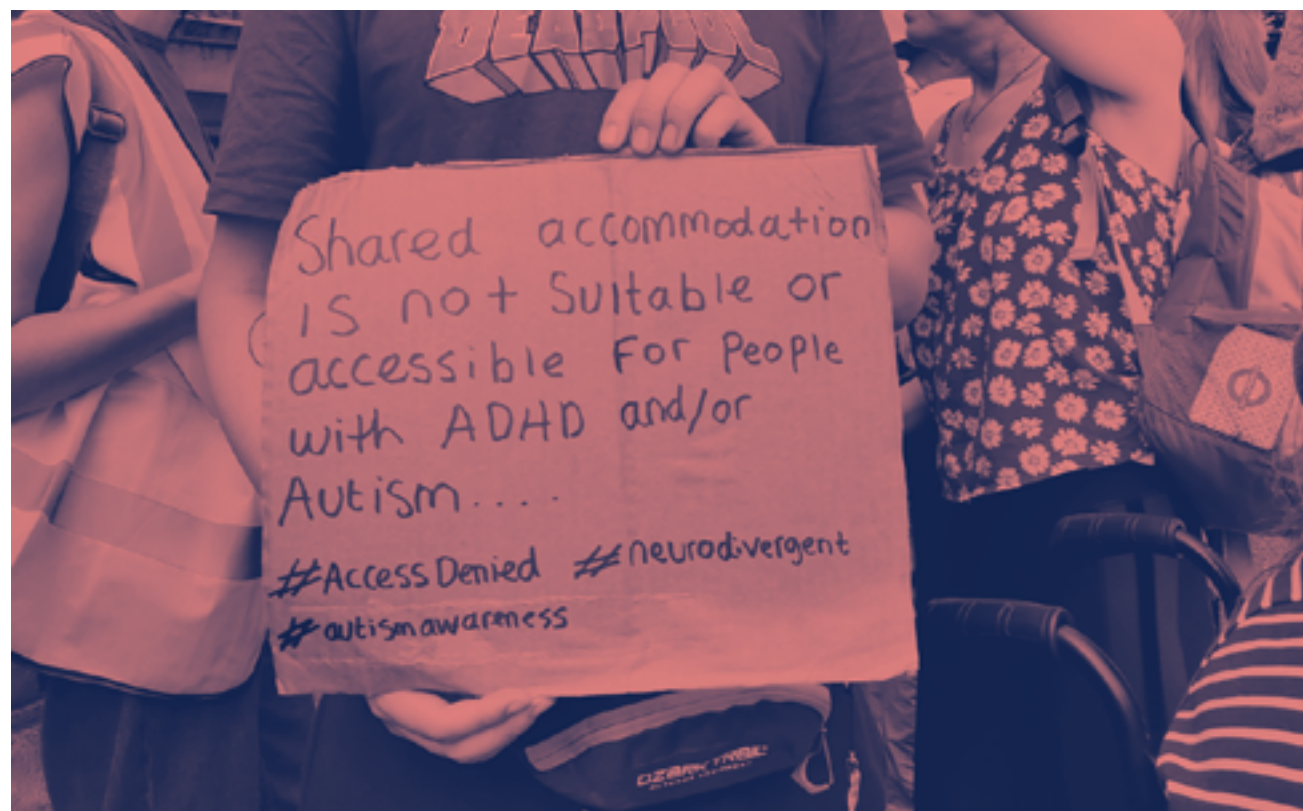


Photo: Inclusion London

Temporary accommodation



case study interviewees told us that they had been placed in temporary accommodation at some point in their life.

5 individuals told us that they had been placed in temporary accommodation (TA) at some point in their lives, while 2 still live in temporary accommodation. Of these, some individuals were placed in temporary accommodation whilst waiting for an accessible home, and others were there whilst their current home was being adapted or repaired.

Research conducted by Shelter in 2023 found that temporary accommodation negatively impacts the physical and mental health of Disabled individuals.⁶² Existing evidence also suggests that, nationally, Disabled people are over-represented in temporary accommodation. Justlife found that 35% of residents living in temporary accommodation are Disabled, despite only making up 24% of the total population.⁶³ Therefore, it is unsurprising that almost a quarter of the people we interviewed have experienced living in temporary accommodation.

Inaccessibility

A common theme that emerged in our interviews was that the temporary accommodations individuals were placed in were not suitable to their needs. Interviewees cited the physical inaccessibility of these accommodations as a key barrier to navigating the space and using its facilities. Accessibility barriers included heavy doors, inaccessible bathrooms, doorways, inaccessible kitchens and others, despite being placed in temporary accommodation for months and sometimes, years.

“The last place that I was for 9 months, it was not accessible either.”
Gemma

Disabled people living in temporary accommodation told us they faced challenges maintaining personal hygiene when accessible facilities had not been properly considered or provided. Some people reported that living in temporary accommodation exacerbated their mental distress and increased their levels of anxiety and depression. They also told us they were

placed in temporary accommodation for months, and sometimes years. This was despite the temporary nature of temporary accommodation and the unsuitability of temporary accommodation which exacerbated pre-existing impairments while creating new ones.

Financial strain

Another difficulty mentioned was the lack of adequate cooking facilities in temporary accommodation which compromised people's ability to cook meals and forced some to buy takeaway food as an alternative to cooking, placing a significant financial strain on them. Some other interviewees told us that, while they bought temporary cooking facilities, such as microwaves, they were often not allowed to use them. They also added that, due to the temporary nature of the accommodation, they were moved around often from one accommodation to another and had to bring microwaves with them.

“ We ended up bringing a microwave in. They didn't like the idea, but I said, we need something, at least to heat the food, because getting takeaways is very costly.”

Tracey

Adaptations

A significant problem that was raised by interviewees was the difficulty in getting adaptations in their temporary accommodations. Some individuals were told by housing providers they were not allowed to make any housing adaptations to adapt their temporary accommodation despite living there for a considerable amount of time and being advised by occupational therapists they were necessary for their health. Others faced significant challenges in getting permission from their providers to make temporary and reversible adjustments. The lack of flexibility in allowing permanent changes prevented residents from receiving essential adaptations, even when they could benefit future Disabled tenants.

“ There's this whole thing about we don't do Disabled adaptations in temporary accommodation... but I said, that's fine, I'll stop being Disabled while you sort my house out.”

Kaya

“ No, we haven't got a Disabled Facilities Grant, they [council officers] said, because this is temporary accommodation. They're not allowed to make any permanent changes or big changes.”

Steph



Photo: Guilhem Baker

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

Introduction

Our research into the housing experiences of Deaf and Disabled Londoners revealed strong links between housing accessibility, affordability and security of tenure. Our findings suggest that accessible homes are critical to promote Disabled people's physical and mental health and play a significant role in enabling them to live independently as long as they are affordable and provide a sense of security to people living in them.

It is widely recognised that London has a significant affordable housing need and need for social rented housing is particularly high among Disabled people. There are currently 323,637 households on social housing waiting lists in London, of which 23,397 are people with health conditions or impairments.⁶⁴ The demand for social rent housing has far outstripped the supply over many years.⁶⁵ While the need to build more social rent homes in London to meet demand is not disputed, it is unclear whether London decision-makers recognise the ties between housing insecurity, unaffordability and inaccessibility, and whether their policies and practices reflect these links.

In light of this, our research aimed to investigate the extent to which the policies and practices of the GLA and local authorities in London support the delivery of accessible social rent homes, particularly of wheelchair accessible social rent homes.

We first sought to assess the evidence base local authorities rely on to plan and deliver the homes Disabled people need.

We reviewed local authorities' development plans, local housing assessments and local housing strategies to understand whether they included any policies and targets supporting the delivery of accessible social rent housing and whether they monitored data on accessible homes being built in their areas alongside tenure. In the first 2 sections of this chapter, we report an analysis of:

- responses received by 31 local authorities to FOI requests submitted to 33 councils to understand whether they have an accurate knowledge of the affordability of the accessible homes being built in their areas.

- findings from semi-structured interviews we conducted with 6 local authorities in London. These interviews were done to explore whether councils face any barriers in specifically delivering accessible social rent housing and what support they might need to be able to increase the supply of accessible social rent housing in their boroughs.

In addition to this, we investigated GLA's data, planning policies and funding programmes. We set out to examine the role the GLA plays in influencing the development of accessible social rent homes through levers in the planning system as well as grant funding to housing providers under the Affordable Homes Programme (AHP).

When analysing the Mayor's planning levers, we sought to evaluate whether London Plan's policies on affordable and accessible housing are effective at increasing the supply of general needs accessible social rent housing, and whether data gathered on housing starts and completions as well as monitoring processes are appropriate and conducive to assessing the delivery of accessible affordable homes. In this chapter, we report an analysis of:

- London Plan policies on accessible and affordable housing, including D7, H6, H7, H10 and M1, as well as data on housing starts and completions being collected on the London Planning Datahub and monitored in the Annual Monitoring Reports. We undertook this to understand whether there is any coordination between accessible and affordable housing targets, whether existing policies are adequate to address Disabled people's housing needs and whether data on the affordability of new build accessible homes in London is being captured and monitored.

In this chapter, we also analyse the Mayor's existing funding levers to increase the supply of accessible social rent homes not only by building more homes but also by repurposing market homes for social rent. We undertook this analysis to understand:

- Whether grant funding distributed by the GLA to housing providers in London under the Affordable Homes Programme (AHP) is sufficient to increase the supply of new build accessible social rented homes, particularly of wheelchair accessible homes.

- Whether funding conditions and grant rates set by the GLA for acquisitions of existing homes under CHAP are adequate to address the shortage of accessible social rent homes.

Analysis of local authorities' planning policies and data

Local development plans and responses to FOI requests

Our analysis of Local Plans found that 24 London boroughs made no plans for affordable accessible homes. In addition to this, accessible housing is not monitored alongside tenure.

We submitted Freedom of Information (FOI) Requests to all 33 London local authorities and we received 31 responses. We asked for a breakdown of their new build M4(2) and M4(3) approvals and completions by tenure, but received limited responses:

- Only 2 local authorities were able to provide us with the complete tenure breakdown of their approvals and completions for new build homes.
- 4 were able to partially provide us with some the data requested
- 21 could not provide us with any of the data requested
- 5 of these told us to look at the property planning portal from the Greater London Authority.

Overall, we found that, while there is a stated requirement for wheelchair user homes to be built in tenures where local authorities can nominate tenants in the national guidance, this is not being monitored at either London-wide or local level.

Interviews with local authorities: key themes

Demand and supply of social rented housing

Local authorities expressed that the supply of social rent homes in their areas outstrips demand, and that demand is on the rise due to a variety of reasons, including pressures from tenants living in the private rented sector, and individuals in temporary accommodation as well as existing tenants.

“ There’s a lack of supply in social housing for people who are existing council tenants who need to move, for people who are living in the private rented sector and want to move, and people who are homeless.”

Specifically, local authorities cited Right to Buy as a significant barrier to retaining existing homes in the social rented sector. They also explained that the unsuitable conditions tenants experience in the private rented sector, including overcrowding, health and safety hazards and excessive rents increase pressures on the social rented sector.

Right to Buy

The Right to Buy Scheme was introduced by national Government in 1979 to enable social housing tenants to buy the homes they rented at a discount rate. However, since the inception of Right to Buy, the social rent homes that have been sold through the scheme, have not been replaced, and the number of people renting social homes in England has halved. Additionally, 40% of the homes that previously formed part of England’s social housing stock that have been sold under Right to Buy, are now let privately.⁶⁶

One local authority noted that due to Right to Buy, the social housing stock has drastically reduced over the years.

“ But we also had a lot of council stock in the 60s and 70s, much of which is now in private ownership. Leaseholders have acquired it through right to buy.”

Private rented sector

Some local authorities pointed out that a combination of poor housing standards, the lack of adaptations and excessive rents mean that many individuals struggle to live in the private rented sector, thus increasing the demand for social housing and temporary accommodation.

Lack of regulation

Local authorities noted that there is a lack of enforcement of housing standards within the PRS which is leading to poor standards of housing. They acknowledged that whilst regulations and licensing schemes exist, they are not enforced, due to a lack of capacity within local authorities. As a result, tenants are often unable to remain in poor-quality PRS accommodation, increasing demand for temporary accommodation and social housing. Councils emphasised the need for additional funding to improve the enforcement of private rented sector regulations.

“ [We need] funding for enforcement. Because, at the moment, even where we’ve got licensing brought in and we’ve got HMO registration necessary, no one can enforce it. The standards of accommodation are so poor. We all know it. We haven’t got the people to do anything about it.”

“ Yeah, you just need the team of people actually cracking down on the standards so that raises the standards across the sector. This is so that people don’t end up being evicted out by landlords, ending up at our door and being put in hotels.”

Adaptations

Local authorities stated that whilst there is funding for adaptations within the private rented sector, this funding is rarely taken up. This is partly because landlords refuse to make adaptations, but it is also due to residents being reluctant to request adaptations to their landlords in the first place. Tenants are aware of the insecure nature of the private rented sector and, conscious that landlords are often unwilling to make even basic housing improvements to their homes, would rather live in unsuitable homes than asking for adaptations that could increase the likelihood of being evicted or facing rent increases which would push them out of their homes.

Referring to Disabled private renters applying for Disabled Facilities Grants to adapt their homes, local authorities said:

“ [I don’t think] we even necessarily see the applications because I don’t think residents would even think they could ask, because they know what the answer would be. It’s so precarious to try and ask for anything from your landlord at moment.”

“ They [landlords] can get their houses rented like that [click]. I think the funding is available in theory, a limited pot, but the actual management of that is...”

Cost of rent

Two local authorities noted that unregulated rents within the private rented sector are unaffordable for many residents in their boroughs. They shared that when residents ask for improved housing conditions by reporting disrepair or request housing adaptations, landlords tend to carry out retaliatory evictions or increase rents to levels tenants cannot afford to push them out of their homes. They added that landlords have no incentives to comply and would rather increase the rent and bring in new tenants.

“ Most landlords aren’t institutions, they’re like individual owners who might have one if not like 5 properties. They’re just not used to managing work because they don’t really see the point, they’d rather have an easy life and put the rent up which triggers those people leaving. Then, they get in new tenants because the market’s so desperate.”

One local authority specifically mentioned rent controls as a useful measure to protect private renters from spiralling rent hikes and reduce pressures on local authorities.

“ I know we don’t like saying rent control, rent regulation in London. If Sadiq Khan was given those powers, frankly half of my problem would go away because we are picking up the pieces because people can’t afford to live in the rental sector. All the rental sector is so poor that people end up desperately getting to the point where they have to be accommodated elsewhere because the accommodation standards are so poor.”



Photo: Age Without Limits

Funding

Local authorities expressed the need for significant investments in social housing and highlighted the inadequacy of current funding to boost the delivery of social rent homes.

“ But funding social housing in this country is appalling. So, it is virtually impossible to get a large-scale social housing off the ground without huge subsidies and cross-subsidy from internal funds within the council.”

Demand and supply of wheelchair accessible social rent homes

During our interviews with local authorities, councils expressed a clear need for accessible affordable homes.

Local authorities stated that whilst there is a short supply of accessible housing across all tenures, M4(3) wheelchair user homes are in particularly short supply in the social rent sector.

// We have great need for M4(3) accommodation to be in the social rent sector."

However, while most local authorities we interviewed seemed to be in agreement that wheelchair accessible homes need to be built in the social rented sector to meet demand, they acknowledged that they face difficulties in ensuring new build accessible homes are built in genuinely affordable tenures. According to local authorities, developers are more likely to build wheelchair user homes in market tenures, including Build-to-Rent homes and market homes for sale, rather than affordable tenures to increase their profit margin. Local authorities also explained that developers tend to build wheelchair user homes as intermediate products, such as Shared Ownership, rather than social rented housing.

// With the best will in the world, we're not going to persuade them [developers] not to have M4(3) market homes and put them in the social rented homes instead. And if they did, you just get fewer social rented homes. So, I'm not sure that we really deliver what we want to either."

// We've encouraged our planning colleagues to try to enforce that 10% should only be in the affordable tenures. Because there has been a history, like all developers have done this, where they've just said – yeah, we tick the 10% box, but we put all 10 of those frankly larger and in some ways more attractive homes to any purchaser, in the private tenures. Because they just have to tick the box in terms of GLA standards."

// They deliver the affordable housing as shared ownership."

// And it's a significant battle in terms of the percentage of affordable housing that we can achieve from new sites at the moment."

Half of the councils we spoke to specifically stated that the current 10% target of wheelchair accessible homes should apply to homes in the social rent sector.

// This 10% should really all go into social housing, as a minimum. It will scratch the surface just about, but it will definitely be a good way to start... maybe carry on a little bit more and increase it to 15 or 20%."

// It is more beneficial for us, and we have a great need for M4(3) homes in the social rent sector."

In particular, local authorities told us that they feel the 10% of wheelchair accessible homes should be built in social housing:

// My main recommendation would be for planners to insist on it [wheelchair accessible housing] to be in the [social rented] tenure."

// It is really frustrating to see that the 10% of accessible housing goes into the private development side of it or the shared ownership development side of it."

// Especially families with Disabled children, you know they have to live on their PIP, or on their DLA, and sometimes family members can't work because they are full-time carers for their children. Those clients are the ones that we don't see as much because social care may not have an involvement because the families, the mothers and dads are the carers of them. They may not be as expensive right now. But if, after a while, the property that they're living in, whether it's private rented or whatever, becomes unsuitable, and it's too dangerous for the child to live in, and social care has to get involved, this will then become not only terribly traumatic for the family but also absolutely costly for family, social care, and a real urgency for us. So, if we can be proactive and lobby a little bit more and say: this 10% should really go into social housing."

Analysis of GLA's planning levers

London Plan's policies on affordable housing

The Mayor's London Plan, published in 2021, sets a strategic target for 50% of all newly built homes a year to be affordable (Policy H4).⁶⁷ The term affordable is an umbrella term for a variety of tenures for rent and sale.⁶⁸ The key tenures defined affordable in the London Plan are:

Social rent: a low-cost tenure, it is usually around 50% of the local market rent and is determined by a formula set by the Government.

London Affordable Rent: a low-cost tenure. Rents roughly correspond to social rent levels (though are generally slightly higher). This tenure is only available in London and rent levels are pegged to benchmarks set by the GLA.

London Living Rent: an intermediate tenure. Rent levels are based on average local incomes rather than a proportion of market rent. As such, they are at least 20% below market rent, but can be lower than this. This tenure is only available in London and rent levels are pegged to benchmarks set by the GLA.

Shared ownership: a form of "intermediate" housing, which is defined by the GLA as affordable housing that is targeted at people who have little chance of accessing low-cost rented housing, but who are not able to rent or buy a home on the open market. It involves purchasing an initial share of a home (from 10% of the overall value) and paying rent on the unbought share. Buyers can use a mortgage to support the purchase but must usually have a deposit of around 10% of the initial share. Households can buy more shares in the home over time, known as "staircasing".

In the London Plan the Mayor clarifies that social rent is one of the key preferred affordable housing tenures and makes explicit his commitment to build genuinely affordable homes to address social rented housing need identified in the latest London Strategic Housing Market Assessment (SHMA)⁶⁹. The SHMA in 2017 estimated that 30,972 social rented homes are needed per year until 2041, highlighting the critical importance of investing in social homebuilding.⁷⁰

While social rent is identified as one of the Mayor's affordable housing tenures, it is not the only one. Social rent is a priority alongside shared ownership and other intermediate products. While demand for new affordable homes across all tenures is high, there is a special need for far greater numbers of social rent homes to meet the housing needs of Deaf and Disabled people. Our interviews with Disabled people and local authorities revealed that for most Disabled people, intermediate products are not affordable, and social rent is often the only tenure that can provide the affordability and security they need. Local authorities also highlighted that the backlog of unmet demand for social rented homes is far greater than that for both affordable rent and shared ownership. We believe that, instead of social rent being a priority alongside shared ownership, it should therefore become the clear, sole priority.

In addition, through Policy H6 on the Affordable Housing Tenure, the Mayor requires Boroughs to deliver a minimum 30% of low-cost rent homes (either at Social Rent or London Affordable Rent level) and a minimum of 30% of intermediate products (either Shared Ownership or London Living Rent), leaving local authorities the autonomy to decide the type of affordable homes for the remaining 40% based on local need. While the Mayor makes clear that "there is a presumption that the 40% to be decided by the borough will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London", the policy also recommends that "the appropriate tenure split should be determined through the Development Plan process or through supplementary guidance".⁷¹

Our research findings obtained through FOI requests show, however, that contrary to expectations, the processes local authorities have in place to develop local plans are not necessarily fit for purpose because they rely on a very weak evidence base. They confirm existing research, suggesting that local authorities often lack accurate data on people's housing requirements and existing housing stock to be able to predict future demand and therefore plan and deliver the right kind of housing. We contend that the expectation that boroughs would deliver housing in appropriate tenures based on accurate assessments of local housing needs is currently far from reality.

Also, our interviews with local authorities shone a light on the challenges councils face when trying to persuade developers to build social rent homes through S106 agreements and the difficulties in challenging viability assessments that lead to a reduction in the delivery of affordable housing.

We believe that, in light of all this, the Mayor could take a more prescriptive approach in the London Plan by requiring boroughs to build at least 60% social rent homes.

London Plan's policies on accessible housing

London Plan's Policy D7 on accessible housing stipulates that boroughs are required to deliver 10% new build wheelchair user homes and 90% new build accessible and adaptable homes across all tenures. It explicitly states that wheelchair user homes need to be built across all tenures to be able "to ensure all potential residents have choice within a development".⁷²

While it is important to provide genuine choice to Disabled residents about the tenure they want to live in, it cannot be ignored that the need for wheelchair user homes is particularly high in the social rented sector and that the number of Disabled people on social housing waiting lists has significantly risen over the years, signalling the urgency to increase the supply of wheelchair accessible homes in the social rented sector.

Our interviews with local authorities also revealed the challenges they face in persuading developers to build wheelchair user homes in the social rented sector despite the acute shortage of this type of housing in social housing. We believe that, while it is crucial to guarantee that Disabled people have choice of tenure, the priority should be to address the current backlog of unmet demand from wheelchair users for social housing. We therefore contend that the London Plan should consider requiring boroughs to build, at least, a minimum percentage of wheelchair user homes for social rent to meet demand.

Monitoring delivery of affordable accessible homes

As set in Policy H7, Boroughs are also required to monitor and share with the GLA data about the affordable homes being delivered through S106 agreements.⁷³ In addition, planning authorities and applicants, including developers, are expected to supply, among other things, information about planning permissions, approvals and completions of affordable homes on the London Planning Datahub. As part of its annual monitoring process, the GLA monitors affordable housing starts and completions in all London Boroughs by type of affordable housing (low cost and intermediate products).⁷⁴

While the AMR accurately captures data on types of affordable homes that are being built in London, it does not track how many of these affordable homes are accessible. This means it is not possible to assess if and how many affordable homes by type are built to M4(2) accessible and adaptable, M4(3)a wheelchair adaptable and M4(3)b wheelchair accessible standards.

Similarly, while the AMR monitors data on accessible housing starts and completions by M4(2) accessible and adaptable and M4(3) wheelchair user homes standards, data are not broken down by tenure. Therefore, it is not possible to assess how many accessible homes are built for social rent, London Living and London Affordable Rent, shared ownership, market rent or market sale.

More recently, the GLA has also confirmed the existence of a gap in data being collected and monitored on the accessibility of new build affordable homes in London, stating that they do not publish data on how many homes under the AHP 2016–2023 are wheelchair accessible.

In July 2024 the Mayor made clear that "the AHP 16–23 has a number of sub-programmes for which we did not collect information on wheelchair user and accessible/adaptable dwellings and for the main programmes, there was a question whether homes meet the programme's space/accessibility standards. We therefore do not hold data on whether these specific regulations have been met on individual funded homes."⁷⁵

In February 2024, though, the GLA clarified that according to the AHP funding guidance, all applicants bidding for grant funding are required to build homes to accessibility standards and targets set in the London Plan. The guidance explicitly states that developments with 10+ homes funded by the AHP 2021–26 are expected to ensure that all new build homes meet standards for accessible and adaptable dwellings (Building Regulation M4(2)). In addition, at least 10% of all homes in the development must be suitable for wheelchair users (Building Regulation M4(3)).⁷⁶

We believe that, in light of funding requirements included in the AHP funding guidance and the need to increase the supply of accessible and wheelchair accessible social rent homes to meet demand, it is crucial the GLA captures and publishes data on the accessibility of affordable new build homes. This is critical to be able to assess the supply of accessible

affordable homes and build a strong evidence base to plan and deliver the housing needed in London.

Currently, the GLA monitors the implementation of London Plan's policies against a series of measures and Key Performance Indicators (KPIs). Two KPIs included in the London Plan under Policy M1 are:

- The supply of new homes. This is measured by the increase in the supply of new homes over the period (monitored against housing completions and the net pipeline of approved homes), towards meeting the 66,000 net additional homes needed each year up to March 2029.
- The supply of affordable homes. This is measured based on a positive trend in percentage of planning approvals for housing that are affordable housing (based on a rolling average).

In its Annual Monitoring Reports, the GLA assesses whether local authorities are building more homes, of which a proportion needs to be affordable, providing an analysis of why affordable housing targets are being met or not based on KPIs included in the London Plan. The GLA does not, however, assess whether local authorities are building affordable accessible homes and 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 KPI.⁷⁷

We believe that, in the next London Plan, the GLA should set "the supply of accessible and affordable homes" as a KPI to be able to monitor the rates of supply of accessible affordable homes and build a clear picture of gaps in the housing stock based on unmet housing needs identified in the SHMA.

Analysis of GLA's funding levers: delivery of new homes and acquisitions of existing homes

The effectiveness of AHP grant funding in boosting the supply of new accessible social rent homes in London

The other Mayor's key lever to influence the delivery of affordable homes is funding. The Mayor has a number of different programmes through which he can fund the delivery of affordable homes. Of these, the AHP has the largest budget and target of homes to be delivered.

The AHP provides grant funding to support housing providers with the costs of building new affordable homes. Unlike the rest of England where funding is administered by Homes England, in London the GLA runs the programme, administering £4bn through Homes for Londoners. The need to increase investment in social rent homes and the significance of the AHP capital grant funding in boosting social homebuilding in England has been widely documented. Existing research suggests that relying on private developers to deliver affordable housing will not solve the housing crisis and that, combined with other measures, significantly upscaling AHP grant funding will enable social landlords to build the social rent homes we need in the long-run.^{78 79}

As a result of the devolution of housing powers in London, the Mayor of London negotiates with central Government the amount of grant funding that is needed to deliver affordable housing in London that meet demand. The Mayor develops a specific funding guidance for housing providers, setting out the funding conditions imposed by central Government. This funding is then distributed to housing providers who bid for the subsidy they need, negotiating grant rates for homes with the GLA.

As part of funding conditions for the current Affordable Homes Programme 2021-2026, the Mayor and Government agreed that 53% of new grant-funded affordable homes would be for social rent, while the remaining 47% of grant funding would be designated for the delivery of intermediate products (London Living Rent and Shared Ownership homes).⁸⁰

We believe that, given the significant unmet need for social rent housing in London and, particularly, the number of Disabled people on social housing waiting lists, this is not the right balance. While in London there is demand for new homes across all tenures, there is a specific need to significantly boost the supply of social rent homes. There is an acute shortage of social rented homes which most Disabled people need because of affordability and security of this tenure. This has been confirmed by Deaf and Disabled people we interviewed who told us that that intermediate products are not affordable to them. Local authorities also highlighted that the demand for social rented homes has never been greater, especially for wheelchair accessible social rent homes.

We therefore believe that, instead of making social rent a priority alongside shared ownership and other intermediate products, the GLA should ensure that social rent is the only priority. It should also aim for at least 80% of AHP grant money to be allocated to social rent, with the remainder split broadly equally between intermediate products. For this to happen, national Government should remove unnecessary funding restrictions to the allocations of AHP funding in London, giving the GLA the flexibility to use the subsidy in a way that addresses unmet need for social rented housing.

In addition to this, the question of whether capital grant funding provided through the AHP in London is sufficient to deliver affordable homes has been widely debated.

In 2022, the GLA commissioned Savills to assess the amount of capital grant funding required by social housing providers in London to deliver homes to meet identified levels of housing need.⁸¹ The analysis found that London's social housing sector needs £4.9bn of capital investment annually – over 6 times the average annual amount that the GLA currently receives from government through the Affordable Homes Programme 2023–26 (which provides £4bn over 5 years). This reveals a significant underinvestment in the supply of social rented housing in London and the need for national Government to significantly increase funding under the AHP in London.

However, while Savills' analysis takes into account the cost of building homes of different sizes, including homes of larger sizes, when estimating the subsidy gap the GLA would need to increase the supply of affordable homes in London, it is unclear whether it factors into its calculations the cost of building homes with certain accessibility features and, particularly,

the costs of building wheelchair accessible homes in the social rented sector. Housing providers are expected to build 90% new build homes to accessible and adaptable standards and 10% homes to wheelchair user standards (either M4(3)a or M4(3)b).

While M4(2) homes are larger in size and M4(3) homes are even larger, the overall cost of building accessible homes does not exclusively depend on the size of the dwelling but also on the number of accessibility features that dwelling incorporates from the outset. This is specifically true for M4(3) wheelchair user homes. Habinteg estimated that the average 'additional' cost of building an M4(3) home in England, regardless of tenure, ranges from £18,000 to £26,000.⁸² Building a wheelchair user home in the social rented sector is likely to cost significantly more although we could not find accurate estimates relevant to this research.

Therefore, considering the higher costs of building social rent homes in London and the higher costs of building wheelchair user homes in any tenure in England, we contend that the costs of building wheelchair user homes in the social rented sector in London are likely to be significantly high due to a variety of factors, including land costs, and that Savills' estimates of the total subsidy gap are likely to be underestimates if these costs have not been factored in. We therefore believe that existing capital grant funding is unlikely to be sufficient to increase the supply of accessible and wheelchair accessible social rent homes.

We recommend the GLA should accurately review the effectiveness of existing grant funding rates in supporting the delivery of accessible and wheelchair accessible social rent homes of different sizes, ensuring any future affordable housing funding gap analysis reflects the higher costs of building accessible and wheelchair accessible homes in the social rented sector. It should then use appropriate estimates to negotiate 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 effectiveness of GLA's acquisitions programmes in boosting acquisitions of accessible and adaptable market homes to repurpose them for social rent

The Mayor has used the AHP grant funding received by central Government to specifically incentivise councils to bid for funding to acquire market homes in London to repurpose them for social rent or temporary accommodation, with the objective of addressing the backlog of unmet demand for social rent homes and tackling the shortage of TA. The need to boost acquisitions for resocialisation nationally has been widely recognised as an essential measure to address the acute housing need that millions of people, including Disabled people, experience, with many languishing on social housing waiting lists and in temporary accommodation.⁸³ In London the Mayor has supported the view that we cannot only build our way out of the growing housing crisis, acknowledging that, alongside the delivery of new social rent homes, policies and funding programmes should be focused on acquiring private rented homes and converting them to social rent.

Under the GLA's 2016–23 programme, the Mayor's scheme for councils acquiring council homes between 2021 and 2023 was the "Right to Buy Back" scheme. Under the current GLA's programme (2021–2026), the Mayor's scheme for councils acquiring council homes is the Council Homes Acquisitions Programme (CHAP).⁸⁴ While funding for acquisitions derives from AHP grant funding, there are differences between funding conditions for acquisitions under CHAP and those set under the mainstream AHP 2021–26 funding. Unlike funding distributed to providers for building new affordable homes under the mainstream AHP, the Mayor does not set a specific target for acquisitions or set aside ring-fenced funding, and states that numbers are to be "demand-led" based on councils' bids. Also, while under the mainstream AHP funding providers can negotiate grant rates with the GLA and bid for funding, they can only bid for funding without negotiating grant rates. Under CHAP, there are set grant rates for acquisitions, namely a maximum of £200,000 per home for social rent and a maximum of £85,000 per home for accommodation for homeless people.

Given the high numbers of Disabled people on waiting lists for accessible social rent homes, the GLA's council acquisitions scheme should be conducive to address the shortage of accessible and wheelchair accessible social rent homes. However, considering the high costs of acquiring market homes in the capital and particularly the higher costs of acquiring

accessible homes and/or larger homes, it is unlikely that set grant rates for acquisitions in London enable local authorities to acquire accessible and wheelchair accessible homes from the outset and/or acquire larger homes that can be adapted to meet Disabled people's housing needs.

We believe that the GLA should consider 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 homes of larger sizes that can be adapted to meet Disabled people's needs and repurpose them for social rent or temporary accommodation. As part of the programme, the GLA should also offer additional grant making to housing providers to enable them to adapt acquired homes to the highest possible accessibility standard (M4(2) or M4(3)) and ringfence this funding for retrofitting purposes from the Affordable Homes Programme (AHP). However, National Government should provide the GLA with additional grant funding under the AHP to enable councils to acquire these homes and, where possible, adapt those not accessible from the outset to the highest accessibility standards (M4(2) or M4(3)).

In addition, no data is currently collected by housing providers on the accessibility of the homes acquired through the RTTB or CHAP.⁸⁵ This is a significant gap in data collection which prevents councils and the GLA from determining the accessibility level of existing homes and therefore assessing the supply of accessible housing.

The GLA should therefore require local authorities to collect and provide data regarding the accessibility of homes acquired through the GLA's council acquisitions programmes as a funding condition. 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. This would enable local authorities to closely match the supply with Disabled people's housing needs and allocate accessible and/or adaptable homes to tenants with accessibility needs.

7.

Summary and discussion of key findings



This research set out to explore the housing accessibility and affordability barriers that Deaf and Disabled people experience in London and the impact they have on their daily lives, capturing the individual stories of people with different kinds of impairments living across various tenures.

This research also aimed to explore the effectiveness of policies and practices of the GLA and local authorities in supporting the delivery of accessible and wheelchair accessible social rent housing in the capital as well as the adequacy of policies and schemes seeking to retain homes in the social rented sector and acquire market homes for resocialisation to increase the supply of accessible and wheelchair accessible social rent housing.

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

Overall, our findings showed that several Deaf and Disabled Londoners live in inaccessible homes and that living in unsuitable accommodation has a detrimental impact on people's physical and mental health, compromising their ability to live independently. In addition they revealed how living in homes that are also unaffordable and insecure compounds the negative effects of inaccessibility, contributing to a significant deterioration in people's well-being. We contend that unless accessible homes are provided in genuinely affordable and secure tenures, Disabled people's quality of life will continue to drastically diminish, and health inequalities will rise.

Our findings also suggest that demand for accessible housing is outstripping supply and that the backlog for unmet accessible and wheelchair accessible social rent housing is significantly high in London. We found that local authorities are not accurately planning and delivering the accessible and wheelchair accessible homes Deaf and Disabled Londoners need as result of barriers in the planning system as well as funding limitations and restrictions under the Affordable Homes Programme (AHP). We also found that there is a specific need to address the scarcity of good-quality and accurate data about Deaf and Disabled people's

housing requirements and the accessibility level of existing housing stock in London which undermines planners' ability to plan and build the homes Deaf and Disabled Londoners need. We explain that, while housing targets are necessary to boost accessible and wheelchair accessible social rent housing, they need to be revised to ensure they are fit for purpose.



Photo: Guilhem Baker

Disabled people's unmet housing need in London and the impact on their lives

Accessibility barriers

Our qualitative research into the housing experiences of Deaf and Disabled Londoners highlighted that there are Deaf and Disabled Londoners with various kinds of impairments living across different tenures who have significant unmet housing need. The majority of Deaf and Disabled people who responded to our survey told us they live in completely inaccessible homes, meaning they cannot safely and easily use any of the facilities in their homes.

This trend was consistent across all tenures, suggesting that, regardless of whether people rented privately, from a social housing landlord (either council or housing association) or owned their own homes, they were not necessarily more or less likely to live in inaccessible homes. However, while we found a much larger variation in the experience of social housing tenants and owner-occupiers, the housing experiences of Disabled Londoners in the private rented sector consistently showed the total unsuitability of private rented homes.

Responses from our survey suggested that an overwhelming majority of individuals with mobility impairments need housing accessibility features. Approximately, 1 in 3 respondents with mobility impairments indicated that their doorways are not wide enough to accommodate their needs, and they do not have level access in their homes. Given that a large proportion of our survey respondents identified themselves as having mobility impairments, we expected these results.

However, we found that it is not just people with mobility impairments, but also neurodivergent people and people with mental health support needs, Deaf people, and people with sensory and visual impairments need accessibility features, with the majority of respondents (53 out of 84) indicating this. This dispels the myth that only people with mobility impairments need accessible homes.

Across all impairment types, most Disabled people reported lacking accessibility features in various areas of their home, including their kitchens,

bathrooms and other rooms as well as the exterior of the house. The number of Disabled people living in homes with inaccessible bathrooms was particularly high, with nearly 1 in 4 respondents lacking accessibility features they need to use the toilet and 1 in 6 lacking features to use the bath/shower. This means that people's ability to maintain hygiene was compromised, severely impacting their health.

The majority of people also described the lack of noise-reducing insulation as a problem, with 1 in 5 respondents reporting that they need noise-reducing insulation and that it is not present in their current homes. This was a barrier highlighted specifically by people with mental health support needs but was mentioned by people with other impairments too. The lack of adequate lighting in people's homes was also cited as significant issue impacting on their physical and mental health, mentioned by a quarter of interviewees. Inaccessible lighting, noise issues, layouts which impact wayfinding, a lack of temperature control and lack of physical accessibility features, such as level access and wide doorways, can all exacerbate impairments and prevent Disabled people from being able to access all of the features of their homes. These findings shine a light on the importance of ensuring that accessible housing is not exclusively seen as housing that has good physical features, but also non-physical features such as lighting, acoustics, thermal comfort and wayfinding.

In addition to this, more than half of all survey respondents said their local area is not completely accessible to them. Most people we interviewed told us that local transport options were inaccessible to them and that this influenced their ability to take part in community activities and live independently. They also reported significant challenges in navigating the street space and cited the lack of healthcare facilities, shops and services near their homes as barriers to engaging with their local communities. These findings demonstrate the need to build and allocate accessible homes in areas with good accessible transport networks and the need to consider the accessibility of the street space as well as proximity to essential services, such as shops and healthcare facilities, and support networks to enable Disabled people to live full and independent lives.

Our survey findings and interviews also confirmed evidence from previous research studies about the detrimental impact of inaccessible housing on Deaf and Disabled people's quality of life, particularly how unsuitable accommodation compromises their physical and mental health and deprives them of their right to live independently. The majority of people

we spoke to reported that living in an inaccessible home had a negative impact on their physical and mental health, causing them to sustain injuries and experience chronic stress, anxiety and, in some cases, depression. Some people we interviewed revealed that they had had to be hospitalised due to experiencing a deterioration in their mental health.

Half of all interviewees also told us that they leave their homes less often due to inaccessibility, severely impacting their ability to socialise and causing them to isolate from others. Overall, a third of interviewees reported a loss of a sense of independence due to the inaccessibility of their homes.

This research highlighted there is a significant need to tackle accessibility barriers Deaf and Disabled Londoners face within and outside their homes, particularly the accessibility of the local areas in which new accessible and wheelchair accessible homes are built, to be able to reduce health inequalities.

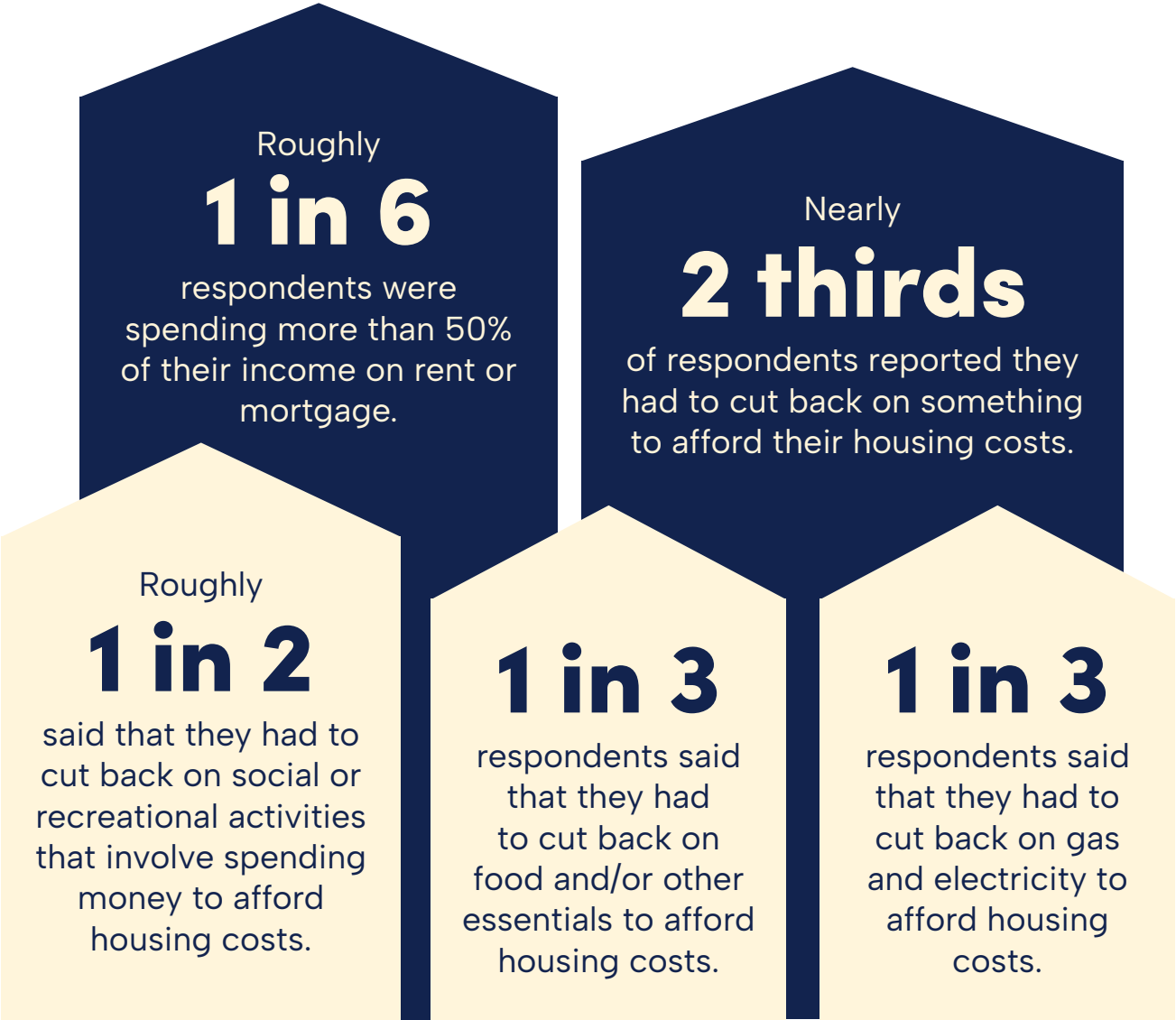
Affordability barriers

Our survey findings and interviews with Deaf and Disabled Londoners also showed that they experience significant housing affordability challenges, and they are disproportionately impacted by the shortage of genuinely affordable homes in the capital. This is a huge cause of concern and has significant implications for the development of any health inequality reduction strategy in London.

Responses from our survey suggested that the majority of Deaf and Disabled Londoners across various tenures are struggling to cope with housing costs and are having to cut back on essentials and recreational activities to afford their housing costs. We found that:

- Roughly **1 in 6 respondents** were spending more than 50% of their income on rent or mortgage.
- Nearly **2 thirds of respondents** reported they had to cut back on something to afford their housing costs.
- Roughly **1 in 2 people** said that they had to cut back on social or recreational activities that involve spending money to afford housing costs.

- **1 in 3 respondents** said that they had to cut back on food and/or other essentials to afford housing costs.
- **1 in 3 respondents** said that they had to cut back on gas and electricity to afford housing costs.



While Disabled people across all tenures felt they are at the sharpest end of the affordability crisis, explaining that it costs more to be Disabled as a result of impairments/conditions-related expenses, it was evident from our interviews that social housing tenants and private renters are particularly affected by the lack of affordable housing. People living in social housing and the private rented sector cited high rents as well increases in rents and service charges as a significant issue negatively impacting their physical and mental health. Most people we spoke to experienced a deterioration of their physical health as a result of having to cut back on heating they need to manage their body temperatures, for example, and essential activities, such as therapies, that are crucial to manage their conditions and impairments. People also described the adverse consequences on their mental health of not being able to afford their housing costs, including the chronic stress and anxiety this generated, how it worsened existing conditions, such as depression, and overall, decreased their sense of self-esteem.

Our findings highlighted that it is not just housing affordability but also security of tenure that matters to Disabled people’s overall well-being. We used “security of tenure” to mean the feeling of being able to live in a home long-term.

As expected, those Deaf and Disabled Londoners currently living in the private rented sector were the only respondents who were more likely to be dissatisfied than satisfied with their tenure and expressed the need to move to social housing or own their own homes. They explained that they preferred a different tenure not only because costs are extremely unaffordable but also because of the lack of security this tenure provides. While social housing tenants and owner-occupiers shared that they were satisfied with their tenure because of the level of stability, sense of community and ability to focus on and manage their health conditions, the opposite was true for Disabled private renters. They expressed the constant fear of being pushed out of their homes as a result of no-fault evictions and sudden rent increases, explaining that the likelihood of being evicted acted as a deterrent to them requesting housing adaptations from their landlord. Landlords’ refusal of housing adaptations increased the risk of being evicted as landlords saw them as complaints rather than requests for reasonable adjustments.

Also, we found that while the experience of Disabled Londoners in the private rented sector when it comes to affordability tends to be worse

on average than those living in social housing, those living in housing associations were more likely to be dissatisfied than council tenants, primarily due to higher rents and high service charges. These findings not only suggest the need to improve access to housing adaptations in the private rented sector but also the need to protect them from spiraling rent costs and unregulated service charges due to the high levels of poverty among Disabled people.

The research also highlighted that, as a result of high housing costs in the private rented sector, Disabled Londoners are being forced to share accommodation with other tenants even though this type of accommodation is largely inaccessible to many, especially to people who are neurodivergent and have sensory issues. It also revealed that the shortage of accessible social rent housing makes Disabled people more likely to be at risk of homelessness and be placed in temporary accommodation (TA). People we spoke to people who had been placed in TA felt the conditions of TA were not suitable to their needs, exacerbating existing impairments as well as creating new ones.



Photo: Simon Lamrock

An inconsistent approach to planning

Our research highlighted 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

Our research findings revealed that most local planning authorities in London are not accurately assessing current Disabled people's housing needs and predicting demand for accessible social rent housing. This significantly undermines their ability to deliver homes according to local need.

The processes most councils have in place to develop local plans are not necessarily fit for purpose to enable them to deliver the housing Disabled residents need in their local areas because they rely on a very weak evidence base. Our evidence confirmed existing research, suggesting that local authorities often 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, and have limited knowledge about the accessibility of their housing stock.

Generally, there is a lack of consistency among local planning authorities about data collection and monitoring practices as well as a lack of cross-team coordination between planning and housing teams, with planners and housing teams working in silos and not sharing necessary data with each other to be able to plan, deliver and allocate the right kind of housing. We found, for example, that even when local authorities were able to provide information about accessibility level of homes within their housing stock,

there was significant variation in the way they categorised their homes, making it difficult to assess the accessibility of the overall housing stock in London. Also, responses from councils to our FOI requests, asking for a breakdown of their new build M4(2) and M4(3) approvals and completions by tenure, revealed only 2 London local authorities were able to provide us with the complete tenure breakdown of their approvals and completions for new build homes, suggesting that most councils do not collect and monitor data on accessible homes being built in their areas alongside tenure and therefore do not have an accurate knowledge of the affordability of the accessible homes being built in their areas.

In addition, interviews from local authorities made clear that councils tend to treat the 10% target in the London Plan for the delivery of wheelchair user homes as a recommended requirement rather than a minimum requirement that might need to be exceeded if local need indicates a higher need for wheelchair user housing. This is alarming and partially explains why supply for wheelchair user homes fails to meet demand in London.

The Greater London Authority

Our analysis of the latest London Strategic Housing Market Assessment (SHMA) revealed that the GLA's evidence base for assessing current and future Deaf and Disabled people's housing need is not sufficiently robust because it does not accurately capture current and future unmet need for accessible affordable housing in London and does not include estimated projections of how many accessible homes by tenure are needed every year to meet the identified need. While the SHMA contains some information about the number of Disabled people needing adaptations and needing to move to social housing, it does not provide any indication of the impairment types of those needing accessible housing, their housing accessibility needs as well as the areas in London where homes are more likely to be needed. It also does not contain any information about the accessibility of the existing housing stock, whether it can be retrofitted and potential improvements to address Disabled people's housing needs.

We also identified significant gaps in GLA's data collection and monitoring practices when analysing the London Planning Datahub and London Plan Annual Monitoring Reports (AMR). We found the GLA does not capture and monitor data on the tenure of new build accessible homes in London. It is 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 or market housing.

This is a significant shortcoming in data collection that impedes the GLA from assessing the supply of accessible affordable housing and building a robust evidence base to plan and deliver the right kind of housing.

Are we planning and building accessible and wheelchair 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 and more needs to be done to boost accessible social housebuilding.

Gaps in accessible housing policies and targets and issues with compliance

London Plan's accessible housing policy encourages boroughs to build general needs accessible homes. Compared to the rest of England, in fact, in London there are higher housing accessibility standards in place that need to be adhered to when building new homes. The London Plan stipulates that 90% of new build homes in London have to be built to M4(2) accessible and adaptable standard and the remaining 10% built to M4(3) wheelchair user standards. Setting higher standards in London offers better chances of finding suitable accommodation than other areas in England.

However, despite this, we are failing to deliver accessible homes across all tenures. While demand for accessible and wheelchair user homes in London outstrips supply, with severe consequences on Disabled people's physical and mental health, as highlighted by councils we interviewed, there is a declining trend in local authorities' compliance with accessible housing targets, with most councils consistently reporting low approval and completion rates for new M4(2) accessible and adaptable homes and M4(3) wheelchair user homes. Our research showed that average approvals

and completions for M4(2) homes have rapidly decreased over the years and stayed below the targets set in the London Plan, with approvals declining from 58% in 2018/19 to just 1.58% in 2022/23 and completions falling from 62.82% to just 36.21% in the same period. Also, on average, approvals for M4(3) homes dropped from 8.41% in 2018/19 to a mere 3.75% in 2022/23, while completions for M4(3) dwellings fell from 9.61% to 4.52% in the same period.

Given the high demand for accessible and wheelchair user homes in London and the stark disparity between what is being reported and the accessible housing targets that should be met, more attention should be paid to investigating the reasons for this lack of compliance.

In addition to this, local authorities pointed out that there is an acute shortage of wheelchair accessible homes, and that the 10% target for the delivery of wheelchair user homes in London might not be sufficient to address demand. This suggests the need to develop an accurate London Strategic Housing Market Assessment that can evidence demand and supply of wheelchair user homes in the capital and the importance of setting accessible housing targets based on need.

Councils also shared that developers are more likely to build wheelchair adaptable homes rather than wheelchair accessible homes, with fully accessible bathrooms and kitchens, because it reduces their costs and increases their profit margin. Contrary to expectations set in the London Plan and National Planning Policy Framework stipulating that homes that local authorities have to nominate or allocate should be designed to fully wheelchair accessible standards, we found that homes are often built to wheelchair adaptable standards rather than wheelchair accessible standards. Adapting homes that could have been built to fully wheelchair accessible standards from the outset not only imposes extra costs for local authorities and national government. It also means that Disabled people who are unable to use kitchens and bathrooms in their homes have to endure a prolonged waiting period for the adaptations to be approved and installed through the Disabled Facilities Grant (DFG), undergo means testing which could mean them having to supplement the grant themselves to make their home accessible, if they can afford it, whilst in the meantime being unable to cook or wash themselves.

While it is crucial to build fully wheelchair accessible homes from the outset, it is not currently possible to monitor if and where fully wheelchair

accessible homes are being built in London. 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 and does not capture and publish data on the number of 'wheelchair accessible' and 'wheelchair adaptable' homes being built in London, overlooking significant differences between the two. This is a gap that needs to be addressed in order to assess the supply of wheelchair accessible homes in the capital.

Are we planning and building accessible and wheelchair accessible homes that are genuinely affordable?

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

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

Local authorities we interviewed highlighted that while demand for accessible and wheelchair accessible homes is high, the shortage of accessible housing is particularly acute in the social rented sector. While they did acknowledge this, responses from our FOI requests suggested that most councils still do not set targets for accessible affordable housing. Our analysis of Local Plans also revealed that 24 London boroughs out of 33 made no plans for accessible homes which are affordable.

We found that also in the London Plan there is a total lack of coordination between affordable and accessible housing targets. In its Annual Monitoring Reports, the GLA assesses whether local authorities are building more homes, of which a proportion needs to be affordable, providing an analysis of why affordable housing targets are being met or not based on Key Performance Indicators (KPIs) set in the London Plan. The GLA does not, however, assess whether local authorities are building accessible homes that are affordable and 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 KPI, unlike the “supply of new homes” and the “supply of affordable homes” which are both KPIs. This is a significant shortcoming in the London Plan because it prevents the GLA from monitoring the rates of supply of accessible affordable homes and building a clear picture of gaps in the housing stock. This in turn does not enable the GLA to take actions aimed at tackling barriers to building accessible affordable homes.

In addition to this, while the need for wheelchair user homes is particularly high in the social rented sector and the number of Disabled people on social housing waiting lists has significantly risen over the years, the London Plan’s policy D7 on accessible housing explicitly states that 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, while it is crucial to guarantee that Disabled people have choice of tenure, the priority should be to address the current backlog of unmet demand from wheelchair users for social housing.

The disconnect between affordable and accessible housing policies in the London Plan suggests the current approach to housing planning and delivery falls short of the expectation to improve housing conditions for Deaf and Disabled people in London. Building more accessible housing in and of itself is not sufficient to reduce health inequalities because poverty rates among Disabled people are shockingly high and the shortage of accessible and wheelchair accessible home is particularly acute in the social rented sector.

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

In our interviews with 6 local authorities, it emerged that demand for social rented housing in London continues to significantly outstrip supply. They highlighted the urgency of increasing the supply of social rented homes to meet demand from homeless households currently living in temporary accommodation, existing social housing tenants needing to move to more suitable accommodation due to overcrowding or on disability/welfare grounds as well as private renters living in homes plagued by poor housing standards. They explained that the Right to Buy policy, introduced by Margaret Thatcher in the 1980s to enable council tenants to buy their



Photo: Simon Lamrock

council homes at a discount, continues to drastically deplete our social housing stock because social rent homes are being sold off to the private market, making it difficult to meet the housing need of people on low-income who are languishing on social housing waiting lists, many of whom are Disabled people.

Councils pointed out that currently, in their boroughs a large proportion of new affordable and accessible homes tend to be delivered by private developers through Section 106 agreements (S106), also known as ‘planning obligations’. While through the S106 system, they require developers to build a certain proportion of affordable and accessible housing in residential developments, developers use viability assessments to challenge conditions imposed on them by planning authorities. Because accessible and wheelchair accessible social rent homes tend to require more land and therefore cost more to build, developers often argue that it is unviable to deliver accessible social rent homes and the only solution to make developments viable is to squeeze the number of affordable homes required and escape their obligations to build homes of certain sizes as well as homes that meet certain quality and design standards. Councils told us

that Section 106 agreements are often renegotiated with local authorities to reduce costs for developers and that they struggle to challenge developers' attempts to reduce the level of accessible affordable housing because of the technical nature of viability appraisals and limited capacity in planning teams.

Councils also specifically cited the lack of capacity in planning teams and limited knowledge of accessibility and inclusive design standards as issues that prevent them from challenging developers attempting to compromise the quality of homes that are being built.

Some local authorities we interviewed acknowledged, in fact, that they have a very limited understanding of the difference between the accessibility standards in Part M of the Building Regulations (M4(2), M4(3)a and M4(3)b). As a result, they struggle to challenge developers' attempts to cut corners on the design of accessible homes as well as check new developments meet the accessibility standards developers claim to post-completion. They also highlighted that the lack of capacity in planning teams compounds the challenges they face in enforcing compliance with accessibility standards and carrying out post-completion building checks. Some pointed out that they rely on housing occupational therapists (OTs) throughout the development process to ensure homes are fit for purpose and designed to accessibility standards set in the London Plan. A few councils employ housing OTs who get involved in new build housing and provide inputs throughout the development process, from pre-planning and design stages, as well as during build. Housing OT's insights into Deaf and Disabled people's housing needs on the ground enable them to have a good understanding of the demand for accessible housing in a borough and the supply that is needed.

In addition to employing housing OTs, in our research, we did provide a best practice example from Hammersmith and Fulham Council who worked with Deaf and Disabled residents to set up an Inclusive Design Review Panel (IDRP) to ensure planning applications in the borough create new accessible and inclusive buildings that work for everyone. The Panel is a user-led group made up of Deaf and Disabled residents with different impairments, who use the social model of disability to advise the local planning authority on development proposals and actively challenge proposals that fall short of accessibility standards. Their engagement extends to commissioning inclusive training for residents and planning officers.

Overall, our interviews with local authorities highlighted the need for upskilling planning departments on housing accessibility standards as well as on the technical aspects of viability appraisals to fully equip them to challenge developers' attempts to renege on S106 contributions, including cutting corners on the design of accessible homes. The interviews also suggested that local authorities planning teams need significantly more resourcing to be able to develop plans that are fit for purpose, enforce compliance with housing accessibility standards and carry out post-completion building checks. Also, we found that local authorities had very low confidence in the effectiveness of the private sector development approach to deliver the homes Deaf and Disabled Londoners need, suggesting that, 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?

Affordable housing in the London Plan is an umbrella term that is used to describe homes that are built for different tenures, both for rent and for sale. Affordable homes are classified as either low-cost rent homes (Social Rent or London Affordable Rent) or intermediate products, such as London Living Rent and Shared Ownership.

The London Plan explicitly suggests that Social Rent is one of the Mayor's preferred affordable housing tenures alongside London Affordable Rent and other intermediate products. The London Plan also explicitly states that, while a minimum of 30% new build homes are to be delivered by boroughs for low-cost rent and a minimum of 30% for intermediate products, local authorities can determine to deliver the remaining 40% of homes as either low-cost rented homes or intermediate products. We explained that 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 of them cannot afford intermediate products.

Local authorities highlighted that while demand for new affordable homes across all tenures is high, the backlog of unmet demand for social rented homes is far greater than for both affordable rent and shared ownership and there is therefore a special need for far greater numbers of social

rent homes to meet the housing needs of Deaf and Disabled people. Our interviews with Disabled people also revealed that for most Disabled people, social rent is often the only tenure that can provide the affordability and security of tenure they need.

In addition to this, we clarified that presuming in the London Plan that boroughs are able to determine the appropriate tenure split in their areas, by planning and delivering homes according to need identified in local housing market assessments, overlooks the scarcity of good quality data in local plans and the challenges they experience in developing plans that are fit for purpose, suggesting the need for a more prescriptive approach on the affordable housing tenure mix in London.



Photo: Age Without Limits

Is funding under the AHP adequate to deliver accessible and wheelchair accessible social rent homes?

Measures to improve the planning system to build more accessible and wheelchair accessible social rent homes in London are crucial to deliver the homes Deaf and Disabled people need. However, to boost social homebuilding it is crucial to increase investment in social rent homes. Capital grant funding provided under the Affordable Homes Programme (AHP) is central to this.

The GLA negotiates with central Government the amount of funding to distribute to housing providers in London under the AHP to enable them to deliver the affordable homes that are needed. Due to restrictions imposed by national Government on GLA’s funding conditions and the use by national Government of a very wide definition of “affordable housing” encompassing tenures that go beyond social rent, in its latest AHP funding guidance, the GLA allocated 53% of AHP funding on social rent and the remaining 47% on intermediate products. In light of our research findings, we contended that this funding balance might not be appropriate to significantly boost the social homebuilding that most Deaf and Disabled people are in need of, and that AHP funding in London should be predominantly directed to supporting providers with the costs of social rent housing given the high costs of building social rent homes.

We also found that grant funding received by the GLA under the AHP is unlikely to be sufficient to increase the supply of new build accessible social rented homes, particularly of wheelchair accessible homes, because of the higher costs of building accessible and wheelchair accessible homes in the social rented sector. Our findings suggest the need to significantly increase AHP funding to deliver accessible and wheelchair accessible homes in the social rented sector.

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

We contended that we cannot just build our way out of the growing housing crisis and that acquisitions of existing market homes are needed to significantly increase the supply of accessible and wheelchair accessible social rent homes, which Disabled people are in need of. In light of this, we highlighted the benefits of the GLA's council acquisitions scheme in addressing the shortage of social rent homes, pointing out however that this programme should be conducive to addressing the specific shortage of accessible and wheelchair accessible social rent homes given the high demand for social rent housing from Disabled Londoners.

We found that it is 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 and/or acquire homes of larger sizes that can be adapted to meet Disabled people's housing needs, considering the high costs of acquiring market homes in the capital and particularly the higher costs of acquiring accessible homes and/or homes of larger sizes. This is because grant rates for acquisitions are fixed rather than negotiable, making it difficult to acquire accessible and adaptable homes. These findings denote the need for an increase in AHP funding to boost acquisitions and maximise opportunities to retrofit homes to the highest possible accessibility standards as well as the need to review existing funding conditions and set grant rates, enabling providers to negotiate grant rates for homes rather than bidding for funding according to set grant rates to provide them with greater flexibility.

We also highlighted that 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. This is a significant gap in data collection which prevents councils and the GLA to determine the accessibility level of existing homes, assess the supply of accessible housing and allocate accessible homes to those who need them the most.

Photo: Simon Lamrock



8.

Conclusion and recommendations



This report demonstrates in stark detail that many Deaf and Disabled Londoners across all tenures are living in homes that are unsafe, inaccessible and unaffordable. Too many are still being denied the right to live independently because there are not enough general needs accessible affordable homes to live in. This situation is unjust and unacceptable.

Accessibility and affordability are inextricably linked in housing and a critical concern in London, where Deaf and Disabled Londoners are trapped in unsuitable homes and are struggling to cope with housing costs. This exacerbates existing impairments whilst creating new ones, and ultimately limits their ability to have choice and control over their lives.

Demand for accessible affordable housing far outstrips supply in London. Decades of underinvestment in social housing combined with the progressive loss of public housing over the years due to policies like Right to Buy have drastically depleted the social housing stock. The need for accessible social rent homes in London has never been greater, with many Deaf and Disabled Londoners languishing on waiting lists for accessible social rent housing. The shortage of accessible social rent housing has also meant that many Deaf and Disabled Londoners are now being forced to live in the private rented sector – the most insecure, unaffordable and inaccessible tenure in the capital – leading to sharp increases in poverty and inequalities.

Improving the housing conditions of Deaf and Disabled Londoners requires systemic change and firm, public commitments and targets to effecting 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. We need a revolution in accessible social housebuilding – we cannot afford to wait any longer.

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.

Through planning and housing policies, the GLA has a significant role to play to ensure local authorities plan and deliver the right kind of housing for Deaf and Disabled Londoners as well as remove disabling barriers to active travel and public transport. The London Plan and the Mayor's Housing Strategy have a huge potential to transform the housing conditions of Deaf and Disabled Londoners. They can significantly influence the development of accessible social rent homes by setting ambitious targets and policies on accessible affordable housing.

Matching supply closely with demand in London, however, requires a robust evidence base, and therefore, an accurate assessment of Deaf and Disabled Londoners' current and projected future housing needs as well a good understanding of the accessibility of the existing housing stock. Disabled people's housing requirements have to be accurately identified and built into planning and delivery of new housing supply in London to ensure policies and targets reflect actual housing needs.

However, setting ambitious housing standards and targets alone is not sufficient to improve the housing conditions of Deaf and Disabled Londoners. It is crucial that targets are met by all local authorities. For this to happen, councils need to collect good quality data about Deaf and Disabled people and their housing needs in their areas, and increase their knowledge of the existing housing stock, to be able to plan, build and allocate the right kind of housing to Deaf and Disabled Londoners. Our research has shown that local authorities planning departments in London need significant upskilling and resourcing to be able to develop plans that are fit for purpose and ensure developers meet their obligations under Section 106 agreements/challenge developers attempting to renege their S106 contributions.

While this report has primarily focused on the role that the GLA and local authorities in London can play in boosting the supply of accessible and wheelchair accessible social rent homes, national Government also has a crucial role in enabling this. Meaningful change can only happen with appropriate levels of funding from the Westminster Government under the Affordable Homes Programme and significant national reforms to the planning system, particularly to the viability assessment process used by developers to reduce the level of accessible affordable housing.

Also, while building more accessible social rent homes is crucial to meet the housing needs of Deaf and Disabled Londoners, 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 existing homes in the social rented sector, boost acquisitions of market homes to repurpose them for social rent and maximise opportunities to retrofit them to the highest possible accessibility standards to address the backlog of unmet demand. The latest GLA council acquisition programme (CHAP) is vital to address the shortage of social housing but more needs to be done to embed accessibility into every aspect of this programme.

Organisational culture

Many of the challenges Deaf and Disabled Londoners face in housing exist because policies, legislation and regulations are developed without meaningful engagement with Deaf and Disabled Londoners and the organisations that represent them. Meaningful engagement with Disabled people and the organisations that represent them requires moving away from consultation mechanisms. It requires a shift towards embedding co-production engagement models in all housing policies and practices to ensure Deaf and Disabled people's specific needs are addressed from the outset.

In order to remove the accessibility and affordability barriers Deaf and Disabled Londoners experience in housing, government at all levels needs to recognise that we are experts by experience and are able to determine the solutions we need to tackle the housing challenges we face. Progress to ensure Deaf and Disabled Londoners have accessible affordable homes is unlikely to be made unless we are actively engaged in shaping housing policies and practices.

This report points to key measures that central government, local authorities and London's Mayor can take to tackle the affordability and accessibility barriers Deaf and Disabled Londoners experience in housing. Based on the evidence we have collected, the people and the local authorities we have spoken to, and the best practice we have looked at, we have developed a series of recommendations that could be implemented to increase the supply of accessible social rent housing in London. All our recommendations were co-produced with our DDPO Housing Network.

While our report has primarily focused on the supply of accessible and affordable housing in London, we recognised that there are measures that national Government and the GLA could enact to specifically support Disabled social housing tenants and private renters through the London’s affordable housing emergency, protecting them from spiralling rent costs and housing insecurity. These are included in this section of the report. We believe that our recommendations, if appropriately considered, can have a significant and positive impact on the life of Deaf and Disabled Londoners.

Recommendations for the Greater London Authority

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 so that the needs of future Disabled tenants can be met.
- 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 in order 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 with them their local housing strategies

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