**Inclusion London Briefing on Planning and Accessibility**

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This briefing has been co-signed by the following DDPOs:

[Asian People’s Disability Alliance](https://apda.org.uk/) [Action on Disability](https://aod.org.uk/) [Disability Advice Service Lambeth](https://www.disabilitylambeth.org.uk/)

[Action Disability Kensington and Chelsea](https://www.adkc.org.uk/) [Disability Action in Islington](https://www.daii.org/) [Disability Action Haringey](https://www.d-a-h.org/)

[Hammersmith and Fulham Design Review Panel](https://www.lbhf.gov.uk/planning/urban-design-and-conservation/design-review-panel) [Harrow Association of Disabled People](https://www.google.com/search?q=harrow+association+of+disabled+people&oq=harrow+association+of+disabled+people&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTIGCAEQRRhA0gEIODY3OGowajSoAgCwAgA&sourceid=chrome&ie=UTF-8) [Ruils](https://www.ruils.co.uk/)

**Summary**

* Inclusion London is a London-wide pan-impairment user-led organisation which promotes equality for London’s Deaf and Disabled people. Our work is rooted in the Social Model of Disability.
* There are 1.2 million Disabled people in London. All Deaf and Disabled people aspire and have the right to:
* accessible, inclusive, secure and affordable housing that supports their health and wellbeing and independent living.
* Live in accessible and inclusive town centres, with good, accessible, safe and affordable transport networks and a street space free from disabling barriers.
* Through planning policies, the GLA has a significant role to play not only to ensure that local authorities plan and deliver the right kind of housing for Disabled Londoners but also that disabling barriers to active travel and public transport are removed.
* This briefing contains an overview of the key housing and planning issues Disabled people face in London and how the London Plan can be improved to tackle them.

**Accessibility barriers in the built environment**

### **Barriers to active travel**

### The inaccessibility of street space poses significant barriers for Disabled people who want to walk/wheel and cycle.

### Businesses, workplaces, shops and venues are widely inaccessible.

### Obstacles on pavements, including clutter, dockless bikes, and e-scooters, and the design and state of roads, make it difficult for those with mobility and visual impairments to navigate the built environment.

### The cycling infrastructure is also inaccessible, with narrow lanes and lack of storage facilities for non-standard cycles.

### **Barriers to public transport**

### With only 92 out of 270 Tube stations offering step-free access, the tube is often an impractical option.

### Buses, considered more accessible, still pose challenges, including inadequate bus stop infrastructure, unclear timetables, and safety hazards during boarding and disembarking, particularly for those with visual and mobility impairments.

**Inaccessible housing**

* Housing is a fundamental part of independent living for Deaf and Disabled people. Yet, living in an accessible home is often a postcode lottery.
* Accessibility is not just about homes which meet the needs of those with mobility impairments – it is about homes that meet the needs of Deaf people, neurodivergent people, people with visual and sensory impairments.
* Accessible homes need to be in accessible areas, meaning the local transport network is accessible, it is close to medical and social services, family and support networks Disabled people need.

### **Inclusive Design – London Plan’s Policy D5**

* Inclusive design is about ensuring everyone, including Deaf and Disabled people, can use places. This is recognised in Policy D5 of the London Plan.
* There is limited understanding of inclusive design principles and guidance in the construction, design, planning and regulatory professions that leads to designing places that are discriminatory by design.
* Social, cultural and economic inequalities are still being literally built into places because there is not meaningful engagement and co-production with Deaf and Disabled people and DDPOs at the design stage.
* Inclusive design is not a golden thread throughout the planning process and the social model of disability is not truly embedded in the planning of character areas.

#### Recommendations

* Inclusive design and accessibility need to be embedded into the whole housing development process. The GLA should set an expectation that all LAs should employ specialist access consultants to ensure homes are built to the correct standards.
  + 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, using 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.

## **Accessible housing targets – London Plan’s Policy D7**

* Accessible housing targets in London come from Part M of the Building Regulations 2010.
* In London, 90% of all new-build properties should be M4(2) accessible and adaptable standards, and 10% should be M4(3) wheelchair user standards.
* Accessibility standards in London are higher than the rest of England. This means Disabled people have better chances of finding suitable accommodation.
* However, overall, London boroughs are not meeting the targets set out in Policy D7 of the London Plan. Historical data exposes a declining trend in compliance with M4 standards.

#### Recommendations

* The GLA should investigate why London boroughs are so below the targets set out in the London Plan for new build accessible housing targets.
* The GLA should include the “Supply of affordable and accessible homes” as a KPI under Policy M1, Chapter 12 of the London Plan.
  + Under Policy M1, the GLA has set out a series of housing KPIs, “supply of new homes” and the “supply of affordable homes”, and measures against which to monitor the successful implementation of this Plan’s policies. However, the supply of accessible homes is not a KPI.
  + We recommend that the “supply of affordable and accessible homes” is added as a KPI and is measured by the increase in the supply of affordable and accessible homes (monitored against housing completions and the net pipeline of approved homes), towards meeting X number of net additional accessible and genuinely affordable homes needed each year.

### **Viability assessments**

### Developers do not often comply with accessibility regulations and are reluctant to build accessible houses, as they see them as less profitable.

### Viability assessments, which allow developers to modify accessible housing requirements if profits projected below 20%, frequently result in reductions in the proportion of accessible housing that is required.

### Some of this reduction is due the lack of expertise within local authorities (and limited funding to externally engage the expertise needed) to properly analyse and, where needed, challenge viability appraisals.

## **Accessible housing targets are not enough**

### **Wheelchair accessible and adaptable properties**

* 10% of new build homes in London need to be built to M4(3) wheelchair user standards.
* The London Plan does not distinguish between M4(3)a and M4(3)b standards in its targets for new-build properties – the two standards are different.
* M4(3)a properties require adaptations to bathrooms and kitchen to be fully wheelchair accessible. M4(3)b properties are immediately accessible for a wheelchair user to move in.
* Developers are more likely to build M4(3)(a) wheelchair adaptable homes rather than fully wheelchair accessible homes because it costs them less money.
* Building predominantly wheelchair adaptable homes is an issue because:
* It leads to cost-inefficiencies for local authorities and national government who need to resort to Disabled Facilities Grants (DFG) funding.
* prolong the period Disabled people need to live in unsuitable accommodation because they cannot use the kitchen and the bathroom in their home.

#### Recommendations

* The GLA should require that a certain portion of M4(3) properties are fully accessible.
* The GLA should introduce targets for approvals and completions of fully wheelchair accessible M4(3)b homes.
* The GLA should monitor both approvals and completions of M4(3)a and M4(3)b properties.

### **Accessible housing targets only apply to new build homes – the importance of retrofitting the existing London housing stock**

* The London Plan's standards and targets apply only to new builds.
* We cannot just build our way out of the growing housing crisis in London.
* It is key to improve access to adaptations across all tenures and repurpose more private rented homes into social rent accessible homes.
* Planning in London needs to consider how it responds to this diversity of requirements with respect to new build, acquisition for social rent, adaptation to meet changing needs and the opportunities presented by property retrofitting.

#### Recommendations

* The GLA should use the Right to Buy Back fund to adapt homes to higher accessibility standards.
  + It should be a funding condition requirement that existing homes that are repurposed for social rent undergo an accessibility assessment and are retrofitted to the highest possible accessibility standard.

**Lack of coordination between affordable and accessible housing targets**

* Accessibility and affordability are inextricably linked. Disabled people are more likely to live in poverty and have been historically overrepresented in social housing.
* There is a shortage of accessible and adaptable housing, especially wheelchair accessible housing, across all tenures but the shortage is particularly acute in social housing due to the supply not meeting the demand from Disabled people.
* 90% M4(2) and 10% M4(3) apply to new build homes across all tenures to give Disabled people choice and control over their preferred tenure.
* There is currently no coordination between accessible and affordable housing targets for new-builds, or the ability to assess the tenures in which accessible housing is being built.
* There’s nothing in the London Plan that guarantees that the delivery of suitable housing for Disabled people is distributed equally across affordability categories.
* Affordable and accessible housing targets must be brought together in the London Plan .
* A larger proportion of accessible housing needs to be in social housing.

#### Recommendations

* We believe that the GLA should make a requirement that a proportion of M4(2) and M4(3) new-build homes are social rent.
* We want the GLA to monitor the tenure split of new-build accessible homes across affordability categories.

## **Data collection**

* A trend in planning and accessibility in London is an overall scarcity of data which makes it difficult to fully assess specific need for accessible homes and deliver according to need.
* In order to meet the needs of all Londoners, it is vital that the GLA and local authorities collect and have access to data to assess the current and future housing need so that they can plan and deliver not just more homes, but the right kind of homes for all.
* An analysis of the lack of data in the London Strategic Housing Market Assessment and local authorities’ local plans is included in our main submission.

#### Recommendations

* The GLA should develop a standardised and robust methodology for both itself and LAs to collect data about Disabled people and their housing needs.
* We believe that the GLA should ensure that the next LHSMA accurately captures/identifies current and future unmet need for accessible housing in London and includes estimated projections of how many accessible homes are needed every year to meet the identified need. These data should be used to inform the development of the next London Plan and London Housing Strategy. This data should include:
  + Collect data around the number of Disabled people living in unsuitable accommodation in London, disaggregate data by impairment type, and estimate accessibility features Disabled people are likely to need.
  + Collect data around the tenure Disabled people currently live in and are most likely to need in the future.
  + Estimate the number of accessible homes, including wheelchair user homes, needed each year across all tenures to meet the identified unmet housing need.

### **Allocations**

* If allocations systems do not work, accessible homes will not reach those who need them.
* Local authority properties are consistently incorrectly categorised based on their accessibility level.
* Councils do not hold enough information about the level of accessibility of properties in their areas. This makes it very difficult to match properties according to need.

#### Recommendations

* The GLA should require local authorities to consistently use the Accessible Housing Register.
  + This register was used to ensure that local authorities had a good understanding of their local housing stock.
  + To ensure accessible social housing is available to those who need it. This should be encouraged by providing local authorities will the skillset to be able to implement it.
* DDPOs and local authorities we spoke to believe that having a London-wide Accessible housing register including a list of available accessible and affordable properties in London and the number of Disabled people awaiting accessible social housing would improve allocation.