**Inclusion London Briefing on Planning and Accessibility**

**November 2023**

Inclusion London is a London-wide pan-impairment user-led organisation which promotes equality for London’s Deaf and Disabled people and provides capacity-building support for over 70 Deaf and Disabled People’s Organisations (DDPOs) in London. Through these organisations our reach extends to over 70,000 Disabled Londoners.

Inclusion London is run by and for Disabled people and our work is rooted in the Social Model of Disability, a radical approach to disability developed by Disabled people. It states that people have impairments but that the oppression, exclusion and discrimination people with impairments face is not an inevitable consequence of having an impairment but is caused instead by the way society is run and organised.

The Social Model of Disability holds that people with impairments are ‘disabled’ by the barriers operating in society that exclude and discriminate against them. Inclusion London’s work spans across different areas and topics impacting the lives of Deaf and Disabled people, including housing and planning. Inclusion London facilitates a Housing Network of user-led organisations running housing campaigns and/or delivering housing advice to Deaf and Disabled people, and grassroots housing groups and coalitions. As part of this project, we fund 3 DDPOs who we support to run specific housing campaigns in London.[[1]](#footnote-2)

In this briefing we provide a general overview of the accessibility barriers Disabled people face when navigating the built environment, but we predominantly focus our analysis on the housing accessibility barriers people with different impairments face in London and what can be done to tackle them through planning. This is because we are conducting research into the supply of accessible housing in London. This includes interviews with Local Authorities, a survey of Deaf and Disabled Londoners’ accessibility needs across various tenures, case study interviews and desk-based research. This briefing contains our preliminary findings.

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/)

## Introduction

In England there are 9.8 million Disabled people and 1.2 million of these people live in London.[[2]](#footnote-3) All Deaf and Disabled people aspire and have the right to:

1. Accessible and inclusive housing they can afford to rent or buy.
2. Accessible and inclusive housing that supports their health and wellbeing and independent living.
3. Employment opportunities that pay more than being on benefit.
4. Education and training opportunities.
5. Take part in community activities e.g sport, leisure.
6. Live in accessible and inclusive town centers, with good, accessible, safe and affordable transport networks and a street space free from disabling barriers.[[3]](#footnote-4)

Despite the recognition of Deaf and Disabled people’s equal rights in society, the reality is that we face significant accessibility barriers when navigating the built environment that not only prevent us from enjoying the same opportunities as non-Disabled people but have a detrimental impact on our physical and mental health, thus undermining our right to independent living.

Housing is a fundamental part of independent living, a cornerstone for Deaf and Disabled people who, like our non-Disabled counterparts, want autonomy, choice and control over our lives. However, the reality is that many of us reside in homes which fall short of meeting our accessibility needs and being able to live in a truly accessible and affordable home is often a postcode lottery. We believe that all Deaf and Disabled people should have the right to live in a home that is accessible to us.

To us, accessibility is not just about homes which meet the needs of those with mobility impairments – it is about homes that suit the needs of all Deaf and Disabled people throughout our lives. This includes flashing doorbells and alarms for Deaf people, noise-reducing insulation for autistic people and lever-style taps for those with arthritis. It also means building homes in accessible areas – meaning the local transport network is accessible, it is close to medical and social services, family and support networks.

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. The existing housing stock across England is unfortunately often not accessible or adapted to meet disabled people’s requirements, with only 9% offering minimal accessibility features.[[4]](#footnote-5) The shortage of wheelchair accessible housing is particularly acute, with 400,000 wheelchair users currently living unsuitable homes.[[5]](#footnote-6)

London offers better chances of finding new accessible or adaptable homes as there are higher accessibility standards and targets for new-build homes than the rest of England.

However, even in London Disabled people are struggling to find accessible homes across all tenures and many are living in unsuitable accommodation because the supply of accessible homes is not meeting the demand. There are issues in the planning system such as viability assessments and a lack of understanding of the technical inclusive design and accessibility standards, meaning that targets are not always met. There is specifically a shortage of accessible social housing which Disabled people predominantly need due to the affordability and security of this tenure. Disabled people spend years on waiting lists for an affordable, accessible home, with many forced to rely on the private rented sector (PRS) where 1 in 3 Disabled people live in unsuitable accommodation.[[6]](#footnote-7)This is extremely concerning due to the lack of affordability in the PRS in London and the fact that as Disabled people we are more likely to experience poverty.[[7]](#footnote-8)

Disabled Londoners need more accessible and affordable homes and currently the London Plan does not encourage this.

Living in inaccessible properties means living in homes which are not built to allow us to use their facilities. Consequently, we are more reliant on the care system to assist us in our homes, less likely to be employed and must endure hospitals beyond discharge dates as our homes do not accommodate our basic needs.[[8]](#footnote-9)[]](https://ukc-word-edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en%2DUS&rs=en%2DUS&wopisrc=https%3A%2F%2Finclusionlondon.sharepoint.com%2Fsites%2FPUBLIC%2F_vti_bin%2Fwopi.ashx%2Ffiles%2F6d4112db54d04800ae12813c91aa18e3&wdlor=cC1546616-3FE0-4B6E-9B47-AC5D75F3EC4F&wdenableroaming=1&mscc=1&hid=937D628C-9A48-4ADB-9D31-F60F18C3D31F&wdorigin=Outlook-Body.Sharing.ServerTransfer&wdhostclicktime=1700212608094&jsapi=1&jsapiver=v1&newsession=1&corrid=ef5bff3f-7591-449b-96f5-f11a06608640&usid=ef5bff3f-7591-449b-96f5-f11a06608640&sftc=1&cac=1&mtf=1&sfp=1&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_SingleFlush&rct=Normal&ctp=LeastProtected#_ftn1) Habinteg’s latest research reveals that for a working age wheelchair user, the benefit of living in a wheelchair user home is valued at £94,000 over ten years. This includes savings in public spending – NHS, local authority and welfare and revenue generation through taxes.[[9]](#footnote-10) Building wheelchair accessible homes would alleviate pressure on services and offset national and local government expenses.

However, we do not believe that we can just build our way out of the growing housing crisis in London and the rest of England. 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.

 Accessibility and inclusive design need to be embedded into and prioritised within the planning system. There is enormous potential for inclusive design and accessibility to be a golden thread throughout the planning process, alleviating the exclusion of Disabled people and having more involvement at design stage. 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 will give an overview of:

* What accessibility barriers Disabled people face when navigating the built environment, including barriers to active travel and public transport
* The principles of inclusive design and Policy D5 in the London Plan
* Policy D7 on accessible housing, what the accessible housing targets are in London and what they mean in practice
* Why we need to prioritise affordable and accessible housing
* Issues with the existing housing stock in London and the importance of retrofitting
* The problems with data collection – both of the GLA and local authorities
* Issues with allocation systems

## Accessibility barriers in the built environment

### Barriers to active travel

While many Disabled people cannot switch to active travel for reasons related to their impairments, there are Disabled people who would like to walk/wheel or cycle more, but they are prevented from doing so by the way the built environment is designed. A significant barrier facing Disabled people is the inaccessibility of street space.

Pavements cluttered by obstacles (including bins, signs, car charging points, A-boards, etc.) are very difficult to navigate for those with mobility impairments and can pose a hazard to those with visual impairments. They are also confusing and overwhelming for those who are neurodivergent. Indeed, 68% of disabled Londoners feel that the condition of the pavements prevents them from being able to spend time on the city’s streets, and 43% have reported that pavement obstacles/clutter were a barrier to being able to walk more.[[10]](#footnote-11) Pavement clutter can prevent people from participating in active travel at any stage of the journey, and can mean that people are forced to take door-to-door transport options, i.e. private car usage (whether their own, as a passenger, or as a taxi customer).

Dockless bikes and e-scooters left in the middle of the pavement or strewn across crossings also present a hazard, and pavements that are steep, uneven, or bumpy (as a result of tree roots, cobblestones, poorly laid paving stones, etc.) are difficult to traverse in a wheelchair and can be trip-hazards. Furthermore, a lack of dropped kerbs render entire sections of pavement/walkways no-go zones for wheelchair users, and pose a trip hazard to visually impaired people.

A lack of alcoves or benches mean that people are unable to stop and rest, which can exacerbate symptoms of certain impairments and health conditions, and confusing streetscape layout, with one-way systems, poor signage, shared space and excess bollards, can be distressing and anxiety-inducing. A lack of street lighting and prevalence of hate crime can put people off walking/wheeling.

Furthermore, a lack of accessible infrastructure across the transport network more widely means that Disabled people are often unable to undertake any sort of active travel at all. In London 79 train stations are missing tactile paving at the platform edge. If making multimodal journeys, such as walking and cycling to a bus stop or train station, the whole journey needs to be accessible. Otherwise, the only accessible option may be to drive or to take a taxi.

Those Disabled people who can cycle also face significant barriers in doing so. According to Wheels for Wellbeing’s Annual Survey of Disabled Cyclists[[11]](#footnote-12), inaccessible cycle infrastructure was cited as the biggest barrier to cycling. The majority of the UK’s cycling infrastructure, including London cycling infrastructure, is designed with a standard two-wheel bike in mind, on the assumption that the rider is able to dismount and lift their bike where necessary. As an example, narrow cycle lanes cannot be used by trikes, handcycles and other nonstandard cycles, and the lack of continuous or joined up cycle routes force cyclists to dismount or perform tricky manoeuvres. It is also the case that a lack of storage facilities for non-standard cycles means it is not always practical to cycle for a commute as there is nowhere to store the cycle securely.

Furthermore, steps into the cycle lane, or lanes segregated with large kerbs without regular dropped points, are inaccessible to those who cannot dismount, as are access control barriers that are designed to prevent access to motorbikes and mopeds (for example, kissing gates or bollards).

The design and state of the roads is also a barrier: the steep or uneven camber of roads is a bigger problem for those on three wheels as the cycle can easily tip over, and speed humps, potholes, and uneven surfaces of roads are uncomfortable or dangerous to traverse in a non-standard cycle.

It is not just the poor accessibility of the street space that deters Disabled people from walking and cycling. The wider lack of physical accessibility into businesses, workplaces, shops, venues means that it is often not practical to use a cycle or a wheeled mobility aid to get around, as it can’t easily get into the buildings the person needs to access.

### Barriers to public transport

Public transport also comes with a variety of physical and infrastructural barriers. Just 92 out of 270 Tube stations in London are step free.[[12]](#footnote-13) From a purely infrastructural point of view, it is clear that taking the tube or train is not a viable option for many Disabled Londoners.

We know from members of our community that whilst the bus is often the most accessible mode of transport for Disabled people, there are a variety of barriers associated with it. This can start from the beginning of the bus journey, with poor bus stop infrastructure that lacks shelter and seating stops people with energy limiting or mobility impairments from being able to safely wait at the stop. This includes people who may have expensive medical equipment that they cannot get wet. Further, bus stops often lack clear timetables and live departure times, which can be distressing and cause further difficulties on a journey- this is a particular issue for people who have multiple interchanges on their bus journeys due to a lack of other accessible modes.

Furthermore, for disabled passengers, getting on and off the bus is the most critical part of the journey, and is fraught with barriers and opportunities for things to go wrong.

Additionally, in many parts of London some bus stops are no longer safe due to the design of bus stop bypasses which constitute a significant health and safety hazard for people with visual and mobility impairments.

### Inclusive Design

Inclusive design is about ensuring everyone, including Deaf and Disabled people, can use places. The way places are designed affects our ability to move, see, hear and communicate effectively. Inclusive design is everyone’s responsibility and good design is inclusive design.

We at Inclusion London support the Design Council’s 5 principles of inclusive design:

1. Inclusive design places people at the heart of the design process.
2. Inclusive design acknowledges diversity and difference.
3. Inclusive design offers choice where a single design solution cannot accommodate all users.
4. Inclusive design provides for flexibility in use.
5. Inclusive design provides buildings and environments that are convenient and enjoyable to use for everyone [including Deaf and Disabled people].

We welcome Policy D5 on Inclusive Design in the London Plan and in particular, part C of the policy which states that “Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement.”

However, we are concerned that 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 also because there is not meaningful engagement with Deaf and Disabled people and DDPOs at the design stage.

More generally, we are concerned there is too much emphasis in the London Plan 2021 on place making and not enough emphasis on embedding inclusive design to enable Disabled people to live independently in their local communities or across London. As Jane Wilmot OBE stated in [her evidence to the GLA Planning Committee in 2022](file:///C%3A%5CUsers%5CMariellaHill%5CDownloads%5CFuture%20of%20planning%20reforms.pdf), inclusive design needs to be a golden thread throughout the planning process from inception, planning application and approval, through specification to completion.[[13]](#footnote-14)

We are disappointed that neither the Forward nor the Introduction to the London Plan 2021 mentioned either inclusive and accessible development or good design is inclusive design as strategic priorities for the London Plan. This does not set the tone on inclusive design to assure Disabled Londoners that they are a visible and valued community.[[14]](#footnote-15)

There is not enough detail in each chapter to provide assurance that inclusive design is the golden thread embedded in each master plan, each opportunity area, every development to enable everyone, including Disabled people, to have a positive experience whenever they use the facilities provided.[[15]](#footnote-16)

For example, in planning, "character areas" are evaluated in terms of 'design quality' and 'social and cultural significance', and then assessed based on their 'sensitivity to change'. We believe the evaluation of character areas should include the Social Model of Disability, as a formal part of the review. This would encourage planners to look specifically at how the existing character typologies looked in terms of the ability/barriers to all forms of impairments for participating in society. The 'sensitivity to change' could then include the impact of removing these barriers and organising, maintaining, and running the built environment to be more accessible (where homes are, how they can be afforded, what support and care needs would be needed for independent living; how public building are accessed; signage; useability of public transport etc.

***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 and standards – what are they?

Since 2015 the accessibility standards for new builds outlined in the London Plan have been sourced from the [Building Regulations Part M 2010.](https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m)

**What are the Building Regulations 2010?**

The Building Regulations 2010 Part M sets the standards for how new housing developments in England should be built.

It defines three standards for how accessible homes should be. [We have outlined their differences here](#_The_different_standards:).

[[16]](#footnote-17)

**In England:**

Currently, the M4(1) standard is the default option for all new housing developments and standards M4(2) and M4(3) are optional standards. National Government launched a consultation in 2020 on standards of adaptability and accessibility, committing to raise accessibility standards in England - M4(2) is set to become the mandatory minimum across England.[[17]](#footnote-18) As of November 2023, this has still not been implemented.

In July 2022, we welcomed the Government’s commitment to raise the minimum standard of accessibility to M4(2) for all new homes - it is a significant step towards tackling the chronic shortage of accessible homes in England.[[1]](https://ukc-word-edit.officeapps.live.com/we/wordeditorframe.aspx?ui=en%2DUS&rs=en%2DUS&wopisrc=https%3A%2F%2Finclusionlondon.sharepoint.com%2Fsites%2FPUBLIC%2F_vti_bin%2Fwopi.ashx%2Ffiles%2F6d4112db54d04800ae12813c91aa18e3&wdlor=cC1546616-3FE0-4B6E-9B47-AC5D75F3EC4F&wdenableroaming=1&mscc=1&hid=937D628C-9A48-4ADB-9D31-F60F18C3D31F&wdorigin=Outlook-Body.Sharing.ServerTransfer&wdhostclicktime=1700212608094&jsapi=1&jsapiver=v1&newsession=1&corrid=ef5bff3f-7591-449b-96f5-f11a06608640&usid=ef5bff3f-7591-449b-96f5-f11a06608640&sftc=1&cac=1&mtf=1&sfp=1&instantedit=1&wopicomplete=1&wdredirectionreason=Unified_SingleFlush&rct=Normal&ctp=LeastProtected#_ftn1) However, we are disappointed that the Government hasn’t yet consulted on technical changes to the Building Regulations and has not yet provided a timeline for the introduction of the new regulatory baseline. Continued delays only mean a poorer quality of life for hundreds of thousands of Disabled people living in unsuitable housing. Additionally, we are disappointed that the Government rejected the option to mandate a minimum proportion of homes built to M4(3) wheelchair-accessible housing standards despite the significant need for such housing.

**In London:**

Pre 2015, the Greater London Authority required that 100% of new homes met the Lifetime Homes Standard and 10% were wheelchair accessible and adaptable.

Since 2015 in London the standards have been 90% M4(2) and 10% M4(3).[[18]](#footnote-19) This means that London has higher accessibility standards than the mandatory minimum in England.

**The difference between these standards is below:**

###

### The Building Regulations Part M standards:

##### **M4(1)** – Visitable dwellings

* Is when most Disabled people can visit a home.
* This includes wheelchair users being able to enter the building and a WC on the entrance floor.

##### **M4(2)** – Accessible and adaptable dwellings

* These are homes designed to make it possible to **eventually adapt the home** to people’s **accessibility needs over time.**
	+ For example, there should be room for a stair lift.
* Some of the accessibility features already included in this standard are:
	+ no steps to get into the home, parking space, shared areas and private outside space.
	+ Bathrooms that can be used by people who have a wide range of impairments.

##### **M4 (3)** – Wheelchair user dwellings

**M4(3) is split into two types: M4(3a) wheelchair adaptable and M4(3b) wheelchair accessible.**

**M4 (3a) Wheelchair adaptable homes**

* Are homes that **can be adapted for a wheelchair user**.
* No steps to enter the home, shared rooms and outdoor space on ground level.
* There must be room to install a lift if needed.
* Switches, sockets and controls must be accessible to people who have reduced reach.
* Bathroom and kitchen designed so that they can be easily adapted for a wheelchair user.
	+ For example, the walls are strong enough to fix a hoist.

**M4 (3b) Wheelchair accessible homes**

* To be **ready for a wheelchair user to move in.**
* No steps into any part of the home. If there is more than one floor, there must be a lift.
* Bathroom and kitchen must be already accessible for a wheelchair user. This means basins and sinks should be wall hung with a clear zone underneath for leg space.

For more detailed information on the different standards, look here: [Access to and use of buildings: Approved Document M - GOV.UK (www.gov.uk)](https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m)

### Accessible housing targets are not being met

London offers better chances of finding new accessible or adaptable homes and having accessible housing targets in place still does result in a higher proportion of M4(2) and M4(3) homes being planned and built for Disabled Londoners than in England as a whole. However, although all homes planned in the capital should be built according to London Plan policies, in 2020, only 74% of London’s local plans set out accessibility standards. [[19]](#footnote-20)

### Monitoring of targets

Policy D7 of the London Plan stipulates that 90% of all new-build properties should be M4(2) and 10% should be M4(3).

Currently, compliance with the Policy D7 is monitored by the London Planning datahub for both approvals and completions. We have a number of concerns around the data which is collected. The below table is a report drawn from the London Planning Datahub which the GLA uses for its Annual Monitoring Reports.

From: [Residential approvals of M4(2) Accessible and adaptable and M4(3) Wheelchair user dwellings - London Datastore](https://data.london.gov.uk/dataset/residential-approvals-of-accessible-dwellings)

The above table shows the number of new build completions for 2021/22 across all London boroughs. Our main concerns are:

* Overall, for all new-builds across London, the M4(2) completions are well below target at 49%.
* Whilst some boroughs are very close to meeting the 90% M4(2) target, if we apply a lower threshold of 60% compliance with M4(2), 22 boroughs are still beneath this.
* In addition to this, many boroughs are not meeting a 10% target for M4(3) and if we were to lower this threshold to 5% compliance with M4(3) – still only 14 boroughs meet this.

**This is one example; however, we have consistently found that individual boroughs, and overall new-builds in London are considerably below targets set out in the London Plan.**

Total number of properties approved and built across all of London by M4 standard

|  |  |  |
| --- | --- | --- |
|  | M4(2) | M4(3) |
|  | Approval | Completion | Approval | Completion |
| 2015/16 | 66.18% | 40.32% | 8.62% | 0% |
| 2016/17 | 58.89% | 51.40% | 8.22% | 7.27% |
| 2017/18 | 59.89% | 52.60% | 7.43% | 8.70% |
| 2018/19 | 60.05% | 62.45% | 8.08% | 9.73 |
| 2019/20 | 46.32% | 57.67% | 6.34% | 7.42 |
| 2020/21 | 6.54% | 48.28% | 1.28% | 7.22% |
| 2021/22 | 1.40% | 49.23% | 0.32% | 9.29% |
| 2022/23 | 5.42% | 40.35% | 3.28% | 4.71% |

From: [Residential approvals of M4(2) Accessible and adaptable and M4(3) Wheelchair user dwellings - London Datastore](https://data.london.gov.uk/dataset/residential-approvals-of-accessible-dwellings)

The above table is data from the London Planning datahub since the 90% M4(2) and 10% M4(3) standards were created. It shows the percentage of overall properties across London that have been built to M4(2) and M4(3) standards.

We can see that:

* Overall, new-build approvals and completions are consistently below the targets set out in the London Plan.
* In the last three years shown on the table, compliance with M4 standards has significantly dropped, especially for M4(2) new builds.

***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.

This briefing outlines some of the potential causes of local authorities not meeting accessibility targets set out in the London Plan.

## Viability assessments

Viability assessments are a huge barrier to the delivery of suitable housing for Disabled people. These assessments allow developers to adjust affordable and accessible housing requirements if their proposal is projected to yield less than a 20% profit. Local authorities lack the expertise and resources to challenge technical viability assessments and many feel that current planning policy favours developers.[[20]](#footnote-21) As the planning system relies on local authorities to ensure that the new-build homes reflect the needs of the local population, we are concerned that they are not given resources to achieve this. In fact, 57% of councils agree it can be difficult to get developers to build accessible homes.[[21]](#footnote-22)

## Understanding of accessible housing standards

There is a lack of technical understanding of accessible housing standards in the construction, design, planning and regulatory professions. This causes the construction of some homes that, despite their intended accessibility, do not deliver the Building Regulations’ requirements or functions.[[22]](#footnote-23) Therefore, homes are not built to the standards they claim to be built to. Some of the causes of this are:

* Local authorities often lack the expertise or capacity to verify that the detailed designs submitted by developers for new-build homes in the approval stage meet the accessibility standards that they claim to.
* Once new-build homes have been constructed local authorities’ lack of expertise and capacity means they often cannot check that developers built the amount of accessible housing they agreed to.
* Developers appear to have limited understanding of the constructional differences between different M4 standards. This means they do not construct in line with them or record the type of housing they are building correctly.

Consequently, Disabled people move into new-build properties which are advertised as accessible but fall short in meeting our needs. Again, we believe that the GLA should set an expectation through the London Plan that all LAs employ inclusive design consultants/access officers and meaningfully engage with Deaf and Disabled people to ensure homes are built to the correct standards.

## Accessible housing targets are not enough

### Wheelchair accessible and adaptable properties

The London Plan does not distinguish between M4(3)a and M4(3)b standards in its targets for new-build properties, overlooking significant differences between the two. Notably:

* Kitchens and bathrooms in M4(3)a properties can be adapted to be accessible to a wheelchair user but are not immediately accessible to wheelchair users, whilst M4(3)b properties are already accessible.

As a result, wheelchair users move into ‘wheelchair properties’ and then have to undergo applications for Disabled Facilities Grants to adapt their kitchen and bathrooms to be able to use these facilities. This not only means that it is not cost effective for local authorities and national government. It also means that Disabled people who are unable to use kitchens and bathrooms have to endure a prolonged waiting period for the adaptations to be approved and installed, undergo means testing which could mean they have to supplement the grant themselves to make their home accessible, and in the meantime cannot cook or wash themselves.

Some people are not even able to access adaptations through DFG and crowdfund for adaptations they need due to the arbitrary nature of means-testing and the cap set at £30,000 [(we have expanded on this in our Home Adaptations Briefing).](https://www.inclusionlondon.org.uk/services-and-support/our-projects/disability-and-housing-in-london/briefing-for-ddpos-on-home-adaptations-and-reasonable-adjustments/)

We are concerned that without specific targets for M4(3)b homes, developers may opt for building the cheaper M4(3)a accessibility standard to fulfil the 10% requirement of the M4(3) building accessibility target. This presents further barriers for wheelchair users and local authorities who want to allocate them homes which meet their needs.

This lack of distinction between M4(3)a and M4(3)b homes means that in our analysis of all London local plans, we found only 7 local authorities had set targets for M4(3)b homes. Additionally, as the GLA does not monitor M4(3)a and M4(3)b separately but only M4(3) as a whole, it is challenging to analyse where fully wheelchair accessible properties are being built.

***Case Study 1***

Adam is a wheelchair user. He moved into a new-build housing association property in a London borough. Before he moved in, the flat was advertised as wheelchair accessible.

However, when he moved in the kitchen was already accessible to him, but the bathroom was not. He needed a wet room, meaning the property had not been build to the fully wheelchair accessible standard M4(3) b. Therefore, as soon as he moved in Adam had to apply for a Disabled Facilities Grant from the council. This took some time as he had to wait for his assessment from an Occupational Therapist, who initially suggested adaptations such a hoists which were not suitable for Adam’s impairment.

He was granted the adaptation, at a cost of £30,000 to his local council.

***Case study 2***

Hannah, who lives in the Richmond Borough, is also a wheelchair user. They do not live in a new-build home. Their home is not wheelchair accessible meaning they have to be lifted outside of the front door by their husband and son, which has resulted in several falls/ injuries. Hannah only leaves the home if absolutely necessary, such as going to a hospital appointment.

Hannah worked with local DDPO Ruils to get necessary adaptations to their home so that it could be accessible to them. Hannah's family, dependent on a single earner – their husband, faced an initially unaffordable contribution of £9404 for the necessary adaptations. While this amount later decreased to £5846 due to a change in the husband's age bracket, the flawed financial assessment failed to consider the broader cost of living crisis, making the contribution still challenging for the family. The family, unable to bear this financial burden, resorted to crowdfunding, with the community and local grant organisations coming together to cover the cost.

Both of these case studies illustrate is that having to undergo adaptations is a time-consuming process, which leaves Disabled people in unsafe homes for prolonged periods. Additionally, developers building wheelchair adaptable homes (M4(3)a) rather than fully wheelchair accessible homes (M4(3)b) means that either the Disabled person themselves or the local council has to undergo further costs to adapt the property.

***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

A GLA report in 2021 found that only 3% of London housing stock is ‘visitable’ for those with a mobility impairment.[[23]](#footnote-24) Therefore, new-build homes are key to fulfil the unmet need for both wheelchair accessible and adaptable homes, as well as homes that are suitable for those with mobility impairments.

However, the accessibility standards and targets in the London Plan only apply to new-build homes. This is not enough to meet the growing need for accessible housing in the capital. Homes in London should also be retrofitted, where possible, to ensure its existing stock to make it as accessible as possible for people with a wide range of impairments.

An opportunity for this is the Right to Buy Back Scheme or the recently launched Council Homes Acquisitions Programme (CHAP), where the Mayor of London gives funds to local authorities who buy back private rented properties to repurpose them for social rent. We strongly encourage the GLA and Mayor of London to use their acquisitions programmes to ensure retrofitting of existing homes so that they can be made available to a wider range of people in London and meet the needs of Londoners throughout their lives.

***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

Planning Policy Guidance states that wheelchair accessible homes should only be built in cases where the local authority is responsible for allocating or nominating the person to live in that dwelling.[[24]](#footnote-25) This assertion is echoed in the London Plan.[[25]](#footnote-26)

However, 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. The GLA separately monitors affordable housing approvals and completions by tenure (social rented, intermediate, owner occupied, etc.) but does not monitor how many of these starts and completions are accessible.



Source: [AMR 17 Final (5).pdf](file:///C%3A%5CUsers%5CMariellaHill%5CDownloads%5CAMR%2017%20Final%20%285%29.pdf)

It is crucial that the tenure split of new build accessible homes is representative of the demographic needs of Disabled people in London. Historically, Disabled people have been overrepresented in social housing in London. This is due to affordability, more support services, security of tenure and higher legal protections. According to ONS data, since 2013 the percentage of Disabled Londoners living in social rented accommodation has consistently been over 30%, whilst the percentage of non-Disabled Londoners has always been below 15%.[[26]](#footnote-27)

Accessibility and affordability are inextricably linked and cannot be treated as two entirely separate targets as Disabled people in London are more likely to be low income, or in poverty and in need of socially rented accessible homes.[[27]](#footnote-28) Disabled households need an additional £975 a month to have the same standard of living as non-Disabled households.[[28]](#footnote-29) This, coupled with the reality that housing costs in London are higher than anywhere else in the rest of the UK, means that the shortage of accessible socially rented homes in London is forcing more Disabled people into poverty and increasing inequality in the capital. The Legatum Institute found that 38% of those in families with a Disabled person are in poverty, this is significantly higher than the rest of the UK where this figure reduces to 26%.[[29]](#footnote-30)

Our analysis of Local Plans found that 24 London boroughs made no plans for accessible homes which are affordable. In addition to this, accessible housing is not monitored alongside tenure. We are concerned that as a result of this developers may build accessible housing in less affordable housing tenures, which in our view does not reflect the need. We believe the delivery of accessible homes, especially wheelchair accessible and adaptable properties, needs to be distributed equally across affordability categories.

An accessible home is an affordable home. Therefore, in order to build truly accessible housing in London, affordable and accessible housing targets must be brought together.

***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.

### London Strategic Housing Market Assessment

We are concerned about the scarcity of data around people with protected characteristics in the 2017 London Strategic Housing Market Assessment.[[30]](#footnote-31) The LSHMA informs the development of the London Plan and the London Housing Strategy. Data included in the LSHMA fundamentally contribute to the number and type of housing that is planned and delivered in London. The data currently available does not give us a comprehensive understanding of the specific housing needs of Disabled Londoners.

The data provided in the SHMA can be seen below:

* 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.

**What we cannot tell from this data:**

* **The impairment types** of those needing accessible housing, and their subsequent housing accessibility needs. This means this data does not tell us how many people need fully accessible wheelchair homes (M4(3)b), wheelchair adaptable homes M4(3)a or acessible and adaptable M4(2) homes.
* Data about the **existing housing stock in London**. Can it be retrofitted to meet the needs of Disabled Londoners?
* **The areas** 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.

### Local Authority Data

Nationally, only 12% of councils rate their data on Disabled people's housing requirements as 'good' or 'very good’.[[31]](#footnote-32)

We analysed all of the Local Plans and Strategic Housing Market Assessments across London. Our main findings were:

**Data on Disabled people:**

* 10 boroughs contained no information about how many Disabled people lived in the area.
* 7 boroughs contained some information on who needed accessible, affordable housing.
* 7 boroughs had estimates for impairment types in their area.

**Estimate of future needs:**

* In 12 boroughs we could not find any estimate of future needs for accessible housing in their area.
* 24 boroughs did not measure or plan for accessible housing which is affordable.

**Existing council stock:**

* **Most councils did not include data on how much accessible housing was in their area**:
	+ **25 councils** include **no information about how much accessible housing** is in the council stock.
	+ A further **3 councils** note that there is **poor/ a paucity of data available**.

We are concerned about the inadequacy of data collection and monitoring practices of local authorities 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 produce the homes their communities need.

***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.

## Allocation systems

As illustrated in this briefing, improving the standards, targets and implementation of accessible and adaptable homes is integral to providing suitable homes for Disabled people. However, if allocations systems do not work these homes will not reach those who need them.

We have consistently seen that local authority properties are not correctly categorised. This is because 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.

Local authority properties are often not correctly categorised. 69% of local authorities in England cannot estimate what percentage of their social and affordable housing is accessible.[[32]](#footnote-33) Consequently, Disabled people are offered unsuitable properties, while accessible properties are often allocated to those who do not require them. One local authority de-installed 56 wet rooms each costing £10,000 in 2016 because non-disabled residents did not require them.[[33]](#footnote-34)

***Case Study***

Steph who has a mobility impairment was originally placed in temporary supported housing meant for those with learning difficulties and autism in a London borough, with the expectation of a two-year independence transition. They have now been in this arrangement for 12 years. The accommodation is inaccessible, meaning Steph has to shower on the toilet due to limited space and their health condition has deteriorated as they are unable to use their medical equipment in the property.

Steph has been on the waiting list for an accessible property for 15 years but has found it impossible to accept any of the properties they have been offered due to lack of checks and incorrect categorisation.

Their experiences have included on one occasion being told to come and view a flat at short notice, while shielding. Arriving at the flat only to find the lift wasn’t working and so family members had to go and view the flat on their behalf. They have also viewed flats with severe mould and damp causing them to have asthma attacks, without adequate space to turn safely in a wheelchair and with doors that open inwards.

Alternatively, friends of theirs without accessibility needs have been offered and accepted step-free properties as they were not correctly categorised in the same borough. This includes two people from the supported housing where Steph lives who had learning difficulties but no mobility difficulties and were offered and accepted adaptable homes. Steph says the council do not categorise all of the houses, meaning they do not prioritise those with mobility impairments.

Having an accessible home for Steph would mean independence. It would also improve their health as they would have room for physio equipment.

“Disabled people don’t have the option to go out to inaccessible places to work and socialise, so it’s vital that our homes are safe for us, because we do everything here.”

***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.

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