

MINOR ALTERATIONS TO THE LONDON PLAN CONSULTATION

About Leonard Cheshire Disability

At Leonard Cheshire Disability we work for a society in which everyone is equally valued. We believe that disabled people should have the freedom to live their lives the way they choose – with the opportunity and support to live independently, to contribute economically and to participate fully in society.

We are one of the UK's largest voluntary sector providers of services for disabled people with over 250 services across the UK, including care homes, care homes with nursing and homecare services. We aim to maximise personal choice and independence for people with disabilities and all of our services are designed to meet the needs and priorities of the people who use them.

We run the [‘Home Truths’ campaign](#) which calls for all new homes to be built to Lifetime Homes standards (M4 (2)) and 10% of new homes to be built to fully wheelchair accessible standards (M4 (3)). We recognise the excellent work building accessible homes in London over the past ten years, and hope to see it replicated elsewhere in the country.

The need for disabled-friendly homes

Across the UK, both national and local government are failing to provide the homes that disabled people need. As a result, hundreds of thousands of disabled people, like Adam (below), are forced to wash at their kitchen sink, struggle to get in their own front door or use a commode in their lounge.

Last year, more than 300,000 disabled people were stuck on housing waiting lists across Great Britain¹ because there are not enough disabled-friendly homes for them to move into. **This includes around 24,000 disabled people across London.**

In fact, **only 5% of homes in England are considered to be fully ‘visitable’ by someone using a wheelchair.**²

That is despite there being 5 million people in the UK – and **around 600,000 people in London** – who have a mobility problem and could benefit from a disabled-friendly home.³

Adam’s story

Adam is 51 and lives with his wife in London. He became disabled almost ten

¹ No Place like Home, Leonard Cheshire Disability, 2014

² English Housing Survey, Profile of English Housing 2012.

³ ComRes interviewed 2,006 GB adults aged 18+ online between the 4 and 6 June 2014; including 238 who self-identified as having a mobility impairment. Data were weighted to be representative of all GB adults aged 18+. Extrapolation was based on the Census 2011 data (47,754,569 people aged 18+ in Great Britain)

years ago following an accident at work which left him with physical, mobility, and sensory impairments, as well as mental health issues.

After the accident, Adam was told he should be using a wheelchair, but he was living in a top floor flat at the time which made that very difficult. He applied for emergency housing and was told it would take at least 6 months.

Almost a year later, a housing association finally called to say they had been told to house them. They found a house that Adam and his family liked and were told it could be adapted so they bought it on shared ownership.

In 2006, two years after his accident, Adam was concerned that the stair-lift that he had been promised when they moved had not arrived, so he sought advice from an architect who said it would be unsafe to install one, despite the assurances of an occupational therapist when Adam moved into the property.

Adam has complained to the council, but they have said there is nothing they can do – even though they acknowledge that mistakes have been made, as they do not manage the property Adam is living in.

It is now ten years on and Adam is still living in unsuitable housing.

There is a clear need for more disabled-friendly homes – both across the country, and in the capital.

Only by investing in the homes that disabled Londoners need will the thousands of people currently trapped in unsuitable homes be given the chance to live independently, and safely.

Consultation response

We are broadly happy with the minor alterations to the London Plan, and are pleased to see the new legal framework around housing design effectively built into the plan.

However, there are a number of changes which we feel put London's progress towards offering an accessible city for all at risk. We have outlined these points below.

Policy 3.5C

It is our view that the positive features that the plan sets out for new homes (that they must include adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose [and] meet the changing needs of Londoners over their lifetimes) should apply to all homes.

As the plan clearly recognises the benefits of these features, there seems little point in restricting them to new builds only. While it may not be possible to deliver all those features in every single converted or repurposed home, it

would be beneficial to retain a 100% target for all homes, and simply report the proportion of repurposed homes where that target cannot be met.

Para 3.48a

Clearly, for people with mobility impairments – including those who use aids like walking sticks or wheelchairs – step free access is a vital part of making any home accessible. That is why it is included in the M4 (2) standards implemented in the Deregulation Act.

It is our view that the blanket decision to not require smaller buildings to provide level access to all homes risks dramatically undermining the strong leadership which London has provided in building homes which work for disabled people.

By exempting smaller buildings from having to provide level access, the London Plan effectively removes all other accessibility requirements attached to the M4 (2) standard as well. While some of these standards may be reintroduced on a voluntary basis, it seems inevitable that standards will slip as a result of this decision – and disabled Londoners will pay the price with a reduction in choice.

That this decision was made on the grounds of viability seems entirely unnecessary as the National Planning Policy Framework already contains an exemption from any optional housing standards which would affect the viability of a development.

The GLA's own Housing Standards Review Viability Assessment found that the estimated additional cost of the optional access requirements was 2-2.4 per cent of base build cost.⁴ Given properties in London currently sell for an average of almost £475,000⁵, the threat of these additional costs to the viability of the project seems low.

It is our view that the few developments to which the costs of step free access does present a viability challenge would be better picked up by the viability test included in the NPPF, rather than by a specific exemption in the London Plan.

Many thanks for the opportunity to respond to this consultation. Please do get in contact if you would like to discuss any of these issues further. I have included my contact details below for ease of reference.

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⁴ Housing Standards Review Viability Assessment, May 2015, David Lock Associates

⁵ Land Registry, House Price Index, 1 June 2015