# London Assembly Housing Committee's investigation into the Mayor's Affordable Housing Delivery - Inclusion London's briefing

Inclusion London's new housing report "Barriers at Home" brings together evidence on the disproportionate impact of the housing crisis on Deaf and Disabled Londoners and calls on the Mayor of London, national Government and local authorities to use their powers and influence to urgently tackle this deepening crisis.

Inclusion London is a pan-London disability equality organisation, run by and for Disabled people. We work to promote equality and inclusion of Deaf and Disabled people in the capital. We support over 70 DDPOs in London and through those organisations our reach extends to 70,000 Disabled people.

## Disabled people need genuinely affordable homes that meet their access needs

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.[1] 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. The private rented sector is for most Disabled Londoners the most unaffordable and insecure form of tenure. 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.

Disabled people in London typically face greater housing affordability challenges than non-Disabled people due to lower-than-average incomes and higher housing costs. According to Trust for London, 31% of families in London that include a Disabled person are in poverty, compared to 24% of those that don't.[2] 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.[3]

For Disabled people, housing comes with additional costs that non-Disabled people do not face. Scope's latest Disability Price Tag report estimated that Disabled households need an additional £1095 a month to have the same standard of living as non-Disabled households.[4] The 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. 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.

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[1] Office for National Statistics (2022) Disability and Housing Dataset. Available at: Disability and housing – Office for National Statistics (ons. gov.uk)
[2] Trust for London (2024) London's Poverty Profile 2024. Available at: Poverty and disability | Trust for London
[3] Office for National Statistics (2024) Impact of increased cost of living on adults across Great Britain: July to October 2023. Available at: Impact of increased cost of living on adults across Great Britain - Office for National Statistics.
[4] Scope (2025) Disability Price Tag 2025: Living with the extra cost of disability. Available at: Disability Price Tag | Disability charity Scope UK

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## Demand for social rent housing outstrips supply

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.[5] The shortage of genuinely affordable housing in London 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.[6] This highlights the urgent need for accessible social housing in the city.

## The impact of living in inaccessible and unaffordable homes on Disabled people's lives

Disabled people need accessible homes they can afford to live with dignity and independence. Yet, many Disabled Londoners we spoke to are trapped in unsuitable accommodation and are unable to afford their housing costs. This trend was consistent across all tenures.

**1 in 4**

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

**1 in 6**

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

**1 in 3**

respondents had to cut back on food and/ or other essentials to afford housing costs

**1 in 3**

respondents had to cut back on gas and electricity to afford housing costs

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.

Most Disabled people we spoke to said that they sustain injuries and experience chronic stress, anxiety and depression as a result of living in inaccessible homes. Some people are hospitalised due to experiencing a deterioration in their mental health. Social isolation and the loss of independence were also cited as key issues. Many individuals reported leaving their homes less frequently due to housing inaccessibility and depending on others to carry out routine tasks.

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.

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[5] Shelter (2024) Brick by Brick: A Plan To Deliver the Social Homes We Need. Available at: Our 'Brick by Brick' social housing report - Shelter England

[6] Ministry of Housing, Communities and Local Government (2024) Local Authority Housing Statistics data returns for 2022 to 2023. Available at: Local Authority Housing Statistics data returns for 2022 to 2023 - GOV.UK

Many of our respondents experienced a deterioration in their physical health due to having to cut back on expenses that are crucial to manage their conditions and impairments. These included heating, therapies. Not being able to afford housing costs severely impact people's mental health. This generates new impairments and worsens existing ones, such as chronic stress, anxiety, and depression, and overall, decreases people's sense of self-esteem.

For this reason, accessibility and affordability cannot be separated when discussing housing for Disabled people.

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

### Lack of data on accessibility of new build affordable homes funded under the AHP

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).[7]

While the Annual Monitoring Reports (AMR) capture data on the types of affordable homes that are being built in London, they do 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.

The GLA has 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."[8]

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)).[9]

[7] Greater London Authority (2024) London Plan Annual Monitoring Report 19, 2021/2022. Available at: London Plan AMR 19

[8] Mayor Question 2024/2074, Supplying accessible housing (2). Available at: Supplying accessible housing (2)

[9] Greater London Authority (2020) Homes for Londoners: Affordable Homes Programme 2021-26, Funding Guidance. Available at: Affordable Homes Programme 2021-2026 – Funding Guidance

**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.

**The GLA should require 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.**

## Funding to build the homes Disabled people need is inadequate

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).[10]

We believe that, given the significant unmet need for social rent housing in the costs of building wheelchair accessible homes in the social rented 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 as part of our latest housing research who told us that that intermediate products are not affordable to them. Local authorities we interviewed 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 the next AHP funding in London, giving the GLA the flexibility to use the subsidy in a way that addresses unmet need for social rented housing.**

[10] Greater London Authority (2020) Homes for Londoners: Affordable Homes Programme 2021-26, Funding Guidance. Available at: Affordable Homes Programme 2021-2026 – Funding Guidance

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.[11] The analysis found that London's social housing sector needed £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). Savills' analysis revealed 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 took 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 factored into its calculations the cost of building homes with certain accessibility features and, particularly, wheelchair accessible homes in the social rent 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.[12]

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.

[11] Savills (2022) London's Affordable Housing Requirement. Available at: GLA: Affordable Housing Funding Research

[12] Habinteg (2023) Living not existing: The economic and social value of wheelchair user homes. Available at: Living not existing: The economic & social value of wheelchair user homes | Habinteg Housing Association

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 GLA should 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.**

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## Funding to acquire and adapt the homes Disabled people need is inadequate

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 experience, including Disabled people, with many languishing on social housing waiting lists and in temporary accommodation.[13]

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).[14] 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).

[13] New Economics Foundation (2023) Beyond New Build. Available at: Beyond new build | New Economics Foundation

[14] Greater London Authority (2023) Council Homes Acquisition Programme. Funding guidance for London. Available at: GLA: Council Homes Acquisition Programme

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.[15] 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.**

**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.**

For more information about this briefing, please contact **Laura Vicinanza, Senior Policy and Stakeholder Engagement Manager** at laura.vicinanza@inclusionlondon.org.uk

[15] New Economics Foundation (2024) Buying Back Better. Available at: Buying back better | New Economics Foundation

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