



Statement on the EU Affordable Housing Plan 2026

ENIL welcomes that the European Commission is addressing the housing crisis and recognising its social consequences. Access to adequate, affordable and accessible housing is a precondition for independent living and full participation in the community, as recognised under Article 19 of the UN Convention on the Rights of Persons with Disabilities (UNCRPD).

The housing crisis affects disabled people disproportionately. Without accessible and community-based support, many remain excluded from society or at risk of institutionalisation. While the European Affordable Housing Plan acknowledges these challenges, it does not yet provide the safeguards and operational measures necessary to ensure that housing policies fully support independent living.

General problem

The European Affordable Housing Plan recognises that disabled people face barriers in accessing housing and acknowledges the risk of institutionalisation. However, the Plan does not include clear targets, safeguards or binding measures to ensure that housing policies deliver accessible housing and community-based support in practice.

The Plan places strong emphasis on affordability and makes reference to accessibility. Yet accessibility is treated as a non-binding principle rather than a core requirement. For disabled people, affordability without accessibility does not ensure access to housing. Disability is addressed only marginally, rather than being mainstreamed across housing policies.

Specific problems

Disabled people continue to face discrimination and structural barriers in accessing housing. Available data indicate that 9.3% of disabled people experience discrimination when seeking housing, more than twice the rate of nondisabled people. At the same time, an estimated 1.4 million disabled people remain in institutional settings, often due to the lack of adequate and accessible housing.

Although the Plan acknowledges that inaccessible housing increases the risk of institutionalisation, it does not propose safeguards to ensure that EU funding supports accessible, community-based support rather than institutional models. Ensuring accessible and affordable housing is essential to advancing deinstitutionalisation across the EU.

The Plan identifies disabled people as part of vulnerable groups affected by the housing crisis. However, it fails to recognise that their situation differs in a fundamental way. Disabled people face higher living costs and require accessible housing. Recent data indicate that 10.4% of persons with disabilities report being financially overburdened by rapidly rising housing costs. Affordable housing that is not accessible can lead to exclusion.



Homelessness and disability

The Plan promotes housing-led approaches to homelessness, which ENIL supports. However, it does not address the specific needs of homeless persons with disabilities, who are overrepresented among the homeless population. Many homeless people experience psychosocial or other impairments and require access to support services in addition to housing. Therefore ENIL calls for a “housing and support first” approach that combines access to housing with community-based support services to enable sustainable inclusion.

Safety and emergency preparedness

In the context of new construction and the expansion of housing stock, ENIL calls for the inclusion of safe and accessible evacuation plans for disabled people. Emergency preparedness in housing remains insufficiently addressed, and the current policy momentum presents an opportunity to close this gap.

Solutions the Plan offers and initiatives

The European Affordable Housing Plan proposes a range of initiatives aimed at increasing housing supply, mobilising investment and supporting vulnerable groups.

ENIL notes the proposed revision of the Decision on Services of General Economic Interest (SGEI), which may facilitate support for affordable housing targeting disadvantaged groups, including disabled people. This could create opportunities to promote accessible and community-based support, provided that accessibility requirements are integrated into funding criteria.

The Plan also introduces initiatives related to short-term rentals as part of an Affordable Housing Act, a housing simplification package, and the mobilisation of new investments under the current and future Multiannual Financial Framework (MFF). These initiatives may offer opportunities to advocate for accessibility, to address the impact of short-term rentals on disabled people, and to promote funding for community-based services and adequate housing instead of institutional models.

The Construction Services Act and the European Strategy for Housing Construction aim to promote innovation and improve the functioning of the construction sector. These initiatives could provide an opportunity to introduce monitoring mechanisms and good practices related to accessible housing.

The EU Housing Summit and the European Housing Alliance, planned for 2026, aim to facilitate cooperation and the exchange of good practices across Member States. ENIL welcomes these platforms as opportunities to promote accessible and inclusive housing policies.

What is positive and what we can work on



ENIL recognises several elements of the Plan that may support inclusive housing if implemented with strong accessibility safeguards.

The proposed Council recommendation on fighting housing exclusion and the upcoming Citizens Energy Package are positive steps that may contribute to reducing housing exclusion and energy poverty. These initiatives could improve living conditions if accessibility and affordability are addressed together.

The New European Bauhaus promotes inclusive, sustainable and affordable living environments and refers to accessibility as part of inclusion. This provides an important conceptual basis for accessible housing. As the initiative continues to develop, ENIL looks forward to seeing how its commitments to inclusion will translate into concrete measures, including binding accessibility standards to ensure that disabled people can fully benefit.

At the same time, ENIL is concerned that planned simplification measures, including the housing simplification package, may unintentionally weaken accessibility requirements in building regulations. Accessibility must not be treated as optional in the name of reducing administrative burden. Increasing housing supply without ensuring accessibility risks deepening exclusion for disabled people.

Connection to institutionalisation

Accessible housing is a core element of deinstitutionalisation and independent living. When housing policies fail to ensure accessibility, disabled people remain at risk of segregation and institutionalisation.

The European Affordable Housing Plan acknowledges the link between inaccessible housing and institutionalisation but does not provide concrete measures to prevent it. Without binding accessibility requirements, targeted funding and community-based support solutions, the Plan risks perpetuating institutional models rather than supporting the transition to independent living.

Conclusion

ENIL welcomes the European Commission's efforts to address the housing crisis. ENIL will focus its advocacy on forthcoming initiatives where accessibility standards and independent living can be strengthened.

In particular, ENIL will prioritise engagement with the Affordable Housing Act, Housing Simplification Package, Construction Services Act and Citizens Energy Package to ensure that accessibility requirements are binding, EU funding supports community-based support, and housing policies contribute to deinstitutionalisation.

However, the Plan remains insufficient in addressing disability and accessibility. Accessibility must be a core element, since affordable housing without accessibility does not ensure equal access.

ENIL will engage with upcoming initiatives to advocate for:



- binding universal design standards in housing,
- mandatory accessibility requirements linked to EU funding,
- accessible evacuation plans,
- integration of housing with community-based support services,
- specific measures addressing homelessness among disabled people.
- safeguards to ensure that simplification does not weaken accessibility standards.

Only by implementing accessibility and independent living principles into housing policies can the EU ensure that disabled people are not left behind in efforts to address the housing crisis.

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