



European Network on Independent Living

ENIL's response to the call for evidence for the Housing Simplification Package

ENIL welcomes efforts to simplify administrative procedures and reduce unnecessary bureaucracy in the housing sector. We recognise that lengthy and complex procedures can delay housing projects, increase costs and make it more difficult to respond to the housing crisis.

At the same time, **simplification should not come at the expense of accessibility.**

This is extremely important given the scale of the accessibility gap that already exists. Around **90 million people in the EU live with a disability**¹. At the same time, an estimated **70–80% of the existing housing stock is unsuitable for independent living for people with mobility impairments**.² This highlights that the housing crisis is not only about the availability of housing, but also about whether people can access and use it.

ENIL's Independent Living Survey 2024³ provides further evidence of the barriers to independent living across Europe. The survey identifies accessible and affordable housing as a key condition for independent living, highlighting the need for housing that is accessible, affordable and available to disabled people in the community.

This is why we are concerned that in simplifying planning, permitting and other administrative procedures, accessibility requirements could become weaker or easier to overlook. **We support cutting unnecessary red tape, but accessibility requirements should not be considered unnecessary bureaucracy.**

Accessibility is also not an issue that concerns only a small part of the population. The European population is aging, and the European Commission projects that by **2050 around 30% of the EU population will be aged 65 or over**, compared with

¹ **European Commission (2026).** *Enhancing the strategy for the rights of persons with disabilities up to 2030*, COM(2026) 541 final.

https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52026DC0541&utm_source=chatgpt.com

² **European Parliament (2026).** *Resolution of 10 March 2026 on the housing crisis in the European Union with the aim of proposing solutions for decent, sustainable and affordable housing (2025/2070(INI)).*

https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52026IP0064&utm_source=chatgpt.com

³ **ENIL Independent Living Survey 2024:**

https://enil.eu/wp-content/uploads/2025/05/Independent-Living-Survey-2024_WEB.pdf



European Network on Independent Living

around 20% today.⁴ As people age, the likelihood of experiencing changing mobility and other support needs increases. Accessible and adaptable housing will therefore become increasingly important for a much larger part of the population.

Accessibility requirements should not be treated as unnecessary bureaucracy.

Failing to include accessibility in new construction and renovation is not only an equality issue. It is also a question of whether public and EU investment is being used effectively. If we invest in large numbers of new homes that cannot be used by people with different accessibility needs, we risk creating housing that will need to be adapted later or that will not meet the needs of the population in the first place.

Universal Design can help avoid this. Designing housing to be accessible from the beginning can benefit people with different needs and reduce the need for costly adaptations later. Accessibility should also be understood as something that can adapt to people's changing needs throughout their lives.

The same is true for renovation. Accessibility can become much more difficult and expensive when it is considered only after the main renovation decisions have already been made. Technical and financial barriers can make it difficult to deliver accessibility when it is treated as an additional cost rather than something planned and funded from the beginning.

We recognise that building and accessibility requirements differ across Member States. However, simplification should not weaken existing safeguards or make accessibility easier to overlook. Instead, EU initiatives should promote consistent and ambitious accessibility objectives, in line with the UNCRPD.

Accessible housing is essential for independent living and preventing homelessness

For disabled people, inaccessible and unaffordable housing can prevent them from living independently in the community. It can contribute to housing exclusion, homelessness and institutionalisation.

Around 1.4 million disabled people were estimated to live in institutions in the EU in 2020. The lack of accessible and affordable housing, alongside insufficient

⁴ **European Commission (2026).** *Demographic transformation in the EU: understanding change and adapting to its consequences.*
https://commission.europa.eu/topics/employment-and-social-affairs/demographic-change-europe_en?utm_source=chatgpt.com



European Network on Independent Living

community-based support, remains a barrier for people seeking to leave institutional settings.

Housing policies must also address the situation of disabled people experiencing or at risk of homelessness. A housing-led approach is important, but access to housing alone may not be sufficient for people who require support to live independently.

ENIL therefore supports a **Housing and Support First approach**, combining access to permanent, accessible and affordable housing with personalised community-based support. This approach should be integrated into housing policies and investment programmes to prevent homelessness, institutionalisation and re-institutionalisation.

The Simplification Package should:

- Strengthen accessibility standards in new construction and renovation.
- Ensure that simplified planning and permitting procedures do not allow accessibility requirements to be bypassed,
- Promote Universal Design as part of the standard approach to housing development;
- Ensure that EU and national investment in housing contributes to accessible and affordable housing,
- Ensure that housing policies contribute to deinstitutionalisation and prevent re-institutionalisation.
- Involve disabled people and their representative organisations in the development of measures affecting housing accessibility.

The housing crisis requires us to build more housing, but increasing the number of homes alone will not solve the problem. **The housing we build must also be accessible and usable by the people who need it.**

Simplification should be an opportunity to remove unnecessary administrative barriers while strengthening the conditions that make independent living possible. The objective should not simply be to build housing faster, but to **ensure that public and EU investment delivers homes where everyone can live with dignity, choice and control.**