

# MAYOR OF LONDON

**Zoë Garbett AM**

Chair of the London Assembly Housing Committee  
C/o [Diane.Richards@london.gov.uk](mailto:Diane.Richards@london.gov.uk)

**Date:** 27 October 2025

Dear Zoë,

Thank you for your letter following the Housing Committee's meeting on accessible housing, held on 24 June 2025.

I share your concerns regarding the inaccessibility of housing for Deaf and Disabled Londoners and note the detailed comments included in your letter around supply, evidence of need and monitoring.

My response to the recommendations in the report, which is included in the Annex below, provides further detail on my thoughts and potential interventions around the issues raised.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sadiq Khan', with a small '2' written below the name.

**Sir Sadiq Khan**  
Mayor of London

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## Annex

### **Mayor of London's response to the recommendations of the London Assembly Housing Committee's letter regarding accessible housing in London**

#### **Recommendation 1**

The next Strategic Housing Market Assessment should place a much greater focus on accessibility. It should consider a broad range of accessibility needs, including those related to neurodiversity, sensory impairments, physical and mental health conditions, and mobility impairments including wheelchair accessibility. Specifically, it should include:

- A clear estimate of projected accessible housing need by accessibility standard and tenure. This should be developed in alignment with Borough assessments of local need.
- An assessment of existing accessible housing stock by accessibility standard and tenure
- An assessment of the potential to retrofit housing that is currently not accessible to meet different accessibility standards.

The Strategic Housing Market Assessment (SHMA) is a high-level strategic assessment of Londoners' housing needs. The next SHMA will form a key piece of evidence for the new London Plan, but it does not contain policy or policy recommendations. As an evidence document, its methodology is informed by the best practice and an awareness of how other plan-making authorities may assess strategic housing need; however, it is not developed in collaboration with other boroughs, nor does it incorporate their existing evidence. Evidence of housing need at the borough level has been prepared at varying times and using inconsistent methodologies. It will not necessarily demonstrate the most up-to-date evidence to inform strategic planning for London as a whole.

The SHMA's strategic scope necessitates a methodology that can adequately provide estimates for the total housing need of London over the plan period, broken down primarily by tenure and bedroom size. To enable this broad scope and time horizon, there are certain details of need the SHMA does not account for. It will discuss the needs of certain specific groups, including the needs of Londoners with disabilities, in accordance with the National Planning Policy Framework (NPPF).

The evidence presented in the SHMA will include the number of existing visitable and wheelchair-accessible stock, as well as estimates of the current and projected (to 2036) numbers of households with members living with disability and with a member using a wheelchair. This will allow us to quantify the total number of homes that have to be visitable and wheelchair accessible by 2036, which can be enabled by a combination of new build and retrofit.

While the SHMA is an important piece of strategic evidence for the London Plan, it is not exhaustive. It will be complemented by more detailed and specialist pieces of evidence where necessary. For a detailed assessment of the current state of accessible and adaptable housing, the Mayor intends to publish a Housing Research Note: Housing for Disabled Londoners shortly. Evidence of specialist and supported housing need will also be required for the next London Plan and will include an exploration of the need for housing for Londoners with mental health conditions, for example. The scoping for this piece of work is currently underway. Research published by the [Building Research Establishment \(2012\)](#) sought to quantify the accessibility of

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the existing housing stock, including within London, and how easily it could be modified to improve its overall accessibility.

The London Accessible Housing Register, hosted on the Greater London Authority's (GLA) website, is a tool that can be used by social landlords to collect, display and store information on their accessible housing stock. The tool can be used by boroughs to monitor the accessibility of their existing housing stock.

## **Recommendation 2**

The GLA should develop an action plan to improve the accuracy of data on accessible home completions and approvals in the London Planning Datahub. It should share the plan with this Committee within two months of receipt of this letter.

To improve the accuracy of the data relating to accessible homes in the Planning London Datahub (PLD), officers are working on the following set of actions, with the aim of completing these by the end of the year:

- Identify all applications with planning permission, initially since 2020, that are proposing residential units of 10 or more that do not currently hold any data on accessible homes
- Of these, use AI to identify which schemes have sufficient information in the decision conditions to determine what percentage of accessible homes should be recorded
- Where the decision condition information is available, update the historic applications with the correct data information on accessible housing
- Where the decision condition information is not available through lack of decision conditions information on the Planning London Datahub, liaise with the boroughs to provide the information required to update the PLD
- Where the boroughs are not recording accessible home requirements in the decision conditions, the GLA will explore with them why they are not recording the accessible home requirements in the decision conditions and ensure they do this going forward
- Embed the monitoring of accessible home data as standard practice for London boroughs to ensure accurate reporting in the future.

## **Recommendation 3**

The Mayor should establish a working group with the aim of:

- improving the monitoring of and compliance with new build accessibility targets and standards
- facilitating the sharing of good practice across boroughs
- investigating and addressing barriers to the delivery of accessible housing.

The working group should consist of GLA representatives —including the Deputy Mayor of Housing and Residential Development —borough representatives, and Deaf and Disabled Londoners. It should hold its first meeting within three months of the date of this letter.

While the current London Plan sets the requirement for ten per cent of dwellings within residential developments to meet M4(3) standards and be secured through the planning system, local authorities hold the responsibility for ensuring that accessibility standards are met through their Building Control function. City Hall does not have a role in enforcing the compliance of individual schemes.

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The GLA Planning Data and Digital team previously set up a West London Alliance (WLA) Taskforce group between 2022 and 2023 to improve the functionality of, and general data within, the PLD. The taskforce ended as a result of its recommendations, which were successfully implemented at the time. However, given the issues raised, officers will explore forming a similar group to further improve the monitoring of development data, which would include accessible home information.

The Mayor is committed to ensuring that the voices of Deaf and Disabled Londoners are heard in conversations on housing and planning. The Deputy Mayor for Communities and Social Justice, Debbie Weekes-Bernard, chairs the quarterly Deaf and Disabled People's Organisations (DDPO) forum, which brings together DDPOs that provide advocacy and advice on inclusive practices and issues faced by Deaf and Disabled Londoners. Officers are working with the GLA's DDPO Forum to ensure barriers to accessible housing are addressed and to inform future London Plan housing policy.

As outlined in the response to recommendation 1, a Housing Research Note on housing for Disabled Londoners is forthcoming. This will provide an overview of secondary data sources, including the Census and the English Housing Survey, to capture the housing experiences of Londoners with disabilities. The Housing Research Note will be published later this year and complements Inclusion London's "Barriers at Home: Housing crisis for Deaf and Disabled Londoners" report. It has been developed to provide evidence to London boroughs and other partners to support them in addressing the housing needs of Deaf and Disabled Londoners. Once the Housing Research Note has been published, officers will ensure that it is shared with the DDPO forum to ensure it is disseminated across the relevant agencies.

The London Housing Panel, which the Mayor established alongside the Trust for London in 2019, also provides London's voluntary and community sector organisations with a structured forum to consider housing issues and to engage with the GLA and other decision-makers. The London Housing Panel includes Inclusion London, a voluntary organisation representing London's DDPOs, and meets with the Deputy Mayor for Housing and Residential Development on a quarterly basis to raise and discuss housing issues affecting those who face additional barriers to housing.

Alongside the planning framework, another lever for the delivery of affordable, accessible housing is ensuring the delivery of the homes Londoners need through the next Social and Affordable Homes Programme 2026-36. Homes delivered through this programme will be expected to meet the current London Plan requirements and subsequently the requirements of the next London Plan.

Officers are also exploring re-establishing a London-wide Inclusive Design and Access Panel. They are currently exploring its potential scope, including whether it can act as a forum to share best practice and highlight barriers to accessible housing.

## **Recommendation 4**

The Mayor's next Affordable Homes Programme should include clear targets for the number of affordable homes delivered that meet accessibility standard M4(2), M4(3)(a) and M4(3)(b), broken down by tenure.

These targets should be developed through engagement with Deaf and Disabled People's Organisations in London and boroughs, to ensure they are informed by an understanding of current need and gaps in provision. The GLA should report on progress against these targets as part of its quarterly affordable housing statistics.

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The Mayor's London Plan 2021 outlines the requirement that ten per cent of dwellings in residential developments must meet the 4(3)(a) or M4(3)(b) "wheelchair user dwellings" standard, with the remaining dwellings meeting the M4(2) "accessible and adaptable dwellings" standard.

Homes delivered through the next Social and Affordable Homes Programme 2026-36 will be required to meet the requirements of the London Plan 2021 and then those of the next London Plan once this has been adopted. Officers are reviewing feedback from the recent 'Towards a New London Plan' consultation and evidence relating to accessible housing currently. The next Social and Affordable Homes Programme 2026-36 is expected to deliver at least 60 per cent of new homes as social rented housing, and the GLA hopes to exceed this figure in London due to housing need. As per London Plan requirements, a proportion of these homes will be M4(3) accessible housing.

While data collection requirements for the next Social and Affordable Homes Programme 2026-36 are yet to be determined, the PLD will continue to host data submitted by planning applicants and boroughs on accessible housing starts and completions, broken down by tenure.

## **Recommendation 5**

The GLA should take a co-production approach to developing housing policy and programmes. This should be based on in-depth Disability Equality training. This approach should focus on involving Deaf and Disabled People's Organisations in key decision-making processes on an ongoing basis, as equal partners alongside boroughs and other stakeholders.

The Mayor is grateful for the contribution of voluntary and community sector organisations and London's DDPOs in the development of housing policies and programmes and remains committed to ensuring the voices of D/deaf and disabled people continue to be heard. There are a number of existing ways in which this commitment is facilitated.

As outlined above, the London Housing Panel includes Inclusion London – a voluntary organisation representing London's DDPOs – and via the Panel, Inclusion London has supported the GLA to develop planning and housing policies and programmes, such as the Equalities, Diversity and Inclusion (EDI) funding conditions of the Mayor's Affordable Homes Programme 2021-26.

As stated in the response to recommendation 3, the Deputy Mayor for Communities and Social Justice, Debbie Weekes-Bernard, also chairs the quarterly DDPO forum, which brings together DDPOs who provide advocacy and advice on inclusive practices and issues faced by Deaf and Disabled Londoners. Officers are working with Inclusion London to co-produce a Disability Action Plan. The Disability Action Plan is a mayoral commitment to work with Disabled Londoners and the organisations that support them to a) identify actions that can be meaningfully taken forward to improve the lives of Disabled Londoners and b) articulate the good work that is already in train to support Disabled Londoners and ensure that this work is as effective and targeted as possible.

In terms of London Plan policy development, officers held several external engagement events in 2023 as part of the Planning for London programme, which included discussions on accessible housing and inclusive design. Following these events, a [Planning for London programme engagement report on inclusive design](#) was published, and the London Housing Panel was invited to work with the London Plan team to help gather evidence for the Planning for London programme. The Panel supported ten community conversations, and the [report](#) was published in 2024, which included accessibility, accessible homes and inclusive design considerations. The [Planning for London call for evidence](#) was open from 2021 to June 2025 and includes evidence submitted relating to access and inclusion.

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The Towards a New London Plan consultation, which closed on 22 June 2025, received a good representation of responses from different equality groups overall. During the consultation, officers met with members of DDPOs, which led to two targeted consultation events aimed at people with protected characteristics, with 70 attendees in total. The events were promoted widely, held in person and online, and accessibility adjustments were offered in advance. Officers sought to increase representation from different groups. Two further consultation events (one online and one in-person) took place in June 2025 with children and young people. Although a British Sign Language (BSL) video of the consultation content was prepared, officers did not receive the desired levels of representation from D/deaf people and people who are hard-of-hearing. Any D/deaf or Disabled Londoners who needed more time to respond to the consultation were invited to let us know, and bespoke timescales for responses were negotiated. Officers accepted extension requests until 31 July 2025.

As part of making the early stages of consultation on the new London Plan more accessible, officers recently launched an Easy Read version of the Towards a New London Plan document for an additional six-week consultation period. The consultation commenced on Friday 19 September 2025, and will close at 11:59pm on Sunday 2 November 2025. This will provide an opportunity for people who might need an Easy Read version of the materials to respond to the ideas for the new London Plan. Officers are working with DDPOs to promote this additional consultation and will apply learning from this additional consultation to inform how we consult in a more accessible way on the London Plan in the future.

The London Plan team is currently undergoing consultation analysis for the Towards a New London Plan consultation, including reviewing responses and evidence submitted by D/deaf and Disabled Londoners and organisations. Following the close of the consultation on the Easy Read version, time will also be taken to analyse those responses, and this combined engagement evidence will be used to inform future policy.

The Good Growth team recently published a report on 'Designing with Disability' and held a launch event that received good representation from access and inclusion professionals and people with lived experience of disability and D/deafness.

The Mayor is committed to ensuring that all GLA staff and decision-makers are equipped with the training necessary to ensure policy and programmes reflect London's diverse communities. All GLA Housing and Land and London Plan staff are required to complete Dignity and Inclusion training, and staff are also encouraged to complete the Disability Equality and Inclusion Workplace training, which is mandatory for managers. The Disability Equality and Inclusion Workplace training course was developed with Inclusion London and covers the social model of disability, the law, and inclusive and accessible practices. All planning, regeneration and housing staff were recently invited to attend a presentation on neurodiversity and the built environment, which was delivered by Jean Hewitt, author of the British Standard PAS on neurodiversity and the built environment. A GLA-wide session took place in early October. Officers are also exploring organising presentations to planning, regeneration and housing officers on the borough design guide: [Housing Design Needs of neurodivergent residents and residents with learning disabilities in Newham](#) and on work by RIBA, published in 2023, on embedding inclusive design across the development process.

## **Recommendation 6**

The GLA should meet with Deaf and Disabled Londoners and with boroughs within the next two months to better understand the current barriers to adapting homes through the Disabled Facilities Grant process.

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London boroughs are responsible for administering the Disabled Facilities Grant (DFG) to fund adaptations that enable Deaf and Disabled Londoners to live independently in their homes; therefore, boroughs are best placed to identify any barriers to accessing DFG that their residents may face. However, the GLA can support boroughs to share knowledge and promote best practice, if requested to do so, to improve the availability of accessible housing for Londoners.

The Mayor welcomes the Government's announcement of an £86 million additional investment in the DFG for 2025/26, bringing total funding for 2025/26 available nationally to £711 million.

## **Recommendation 7**

Through the next London Plan, the GLA should facilitate a larger proportion of homes being delivered to the wheelchair accessible standard, to avoid downstream costs associated with adaptation. As part of this, the Mayor should meet with the Government to discuss any required changes to the National Planning Policy Framework that would allow the GLA greater flexibility in stipulating a greater proportion of homes are wheelchair accessible.

The Mayor recognises the impact of inaccessible homes on Londoners, including the cost of adapting existing stock and the difficulty of retrofitting some housing typologies. Officers are in the process of developing a new London Plan, including reviewing relevant technical and engagement evidence on accessible housing with a view to publishing a draft London Plan in 2026. Officers are having ongoing discussions with the Government regarding any future changes to the accessible housing policy of the NPPF, and the Mayor remains committed to reviewing barriers to accessible housing delivery.

## **Recommendation 8**

The GLA should engage with boroughs to discuss the ways in which it can support their accessible housing allocation schemes. As part of these conversations, it should proactively investigate how it can facilitate the sharing of knowledge and best practice across boroughs.

While the Mayor does not have a statutory role in the allocation of accessible housing, where boroughs collectively identify that they would welcome the GLA's convening powers, the Mayor will always be responsive. It is the intention that the dissemination of the Housing Research Note (detailed above) with boroughs and DDPOs will continue to raise the importance of this issue with key partners.

The Mayor will continue to work with both Inclusion London and DDPOs to support them in sharing best practice across boroughs. The London Accessible Housing Register has also been developed as a tool to support social landlords in assessing the accessibility of existing stock to improve the allocation of accessible housing units. The London Accessible Housing Register is hosted on the GLA's website, where resources can be accessed by boroughs.