



Zoë Garbett AM

Chair of the Housing Committee

Sir Sadiq Khan
Mayor of London
(Sent by email)

7 August 2025

Dear Sadiq,

Accessible housing in London

I am writing to you following the Housing Committee's recent meeting on accessible housing in London. We heard from a range of stakeholders at our meeting on 24 June 2025, including Deaf and Disabled People's Organisations (DDPOs), Barnet Council, the Centre for Accessible Environments (CAE) at Habinteg Housing Association, and the GLA.

The evidence we heard was stark and compelling. It left us in no doubt of the scale of the challenge Deaf and Disabled people face in finding suitable homes in London – and the profound impact of living in unsuitable, and often unsafe, accommodation. Laura Vicinanza, Senior Policy and Stakeholder Engagement Manager, Inclusion London, told us that finding accessible and affordable housing is the “the biggest challenge of all that Disabled people face in London”.¹

We heard deeply distressing accounts of the day-to-day reality of living in inaccessible homes in London. Hallie Banish, Campaigns and Communications Manager, Ruils, told us about someone placed in temporary accommodation without an accessible bathroom leaving them unable to wash themselves.² Suzanne Iwai, Disabled co-producer living in Hammersmith & Fulham, shared the story of a resident who had to wait for their partner to return home to lift them two floors because they couldn't climb the stairs.³ In one tragic case, we heard of a Disabled Londoner who took his own life after nine months of unresolved complaints to his housing association

¹ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.1

² London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.4

³ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.5

about noise levels in his home.⁴ These examples are not simply exceptions; Laura Vicinanza told us “The number of people we spoke to who experience stress, anxiety, depression, who have had to be hospitalised—it is just outrageous.”⁵

The consequences of inaccessible housing are far-reaching. It can isolate people, force them to live in a single room, or prevent them from leaving their homes.⁶ It often leaves people reliant on partners or carers to meet even their basic needs. It can take a profound physical, mental and emotional toll. This is the human cost of inaccessible housing. We are clear that Deaf and Disabled Londoners deserve better; they deserve to live in homes that meet their needs, allowing them to live with dignity and independence. There is an obvious solution to this: building more social rent accessible homes and retrofitting existing housing. Delivering this is far more complex; but it starts with prioritising this issue and addressing the fundamental gaps in knowledge of accessible housing need and delivery.

Gaps in understanding of accessible housing need

Much is unknown about accessible housing need in London. We heard from Inclusion London that the lack of data on the housing needs of Deaf and Disabled Londoners, and on the accessibility of London’s existing housing stock, was a key issue uncovered through its research.⁷ Specifically, it raised concerns that the current Strategic Housing Market Assessment (SHMA), which provides the evidence base for the London Plan, is inadequate. It said:

“The SHMA does not give any indication of impairment types of people who need accessible homes [...] There are no projections of how many Disabled people and other people might need these homes in the future. Then, also, there is no information about the accessibility of the housing stock [...] whether the stock can be retrofitted and what improvements will be needed to make sure that the homes are accessible.”⁸

While the GLA recognised a clear unmet need for accessible housing in London,⁹ it highlighted that information on the scale and nature of this need was not available. In addition, Velvet Dibley, Senior Policy Officer (Housing), GLA, confirmed that the GLA does not monitor the accessibility of homes funded through the Affordable Homes Programme (AHP) by tenure or affordability.¹⁰ This prevents a clear picture of the current tenure mix of accessible homes, making it difficult to identify unmet need.

As such, we are no clearer on how many Londoners are in need of accessible homes, of what type and in which tenure.

The GLA acknowledged these “gaps in the availability of data”.¹¹ We heard from Kate Gordon, Principal Strategic Planner, GLA, that a new SHMA is currently being prepared, which will include further detail on accessibility, although it may not look at all disabilities.¹² Lisa Fairmaner, Head of the London Plan and Strategic Planning, GLA, added that the new SHMA will set out projections for accessible housing need.¹³ She told us that the focus of the SHMA

⁴ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.6

⁵ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.6

⁶ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.1

⁷ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.7

⁸ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.8-9

⁹ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.2

¹⁰ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.7

¹¹ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.2

¹² London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.1

¹³ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.2

would be on “those elements that we can plan for, like wheelchair accessible homes” and that the GLA are currently exploring how other disabilities “where it is less clear-cut how you might plan for them” can be incorporated into the next SHMA.¹⁴ We welcome these additions but are concerned that they may not go far enough to deliver for the diverse needs of London’s Disabled population. As the evidence base for the next London Plan, it is vital that the SHMA takes far greater account of the issue of accessible housing. Without this evidence base, effective action to tackle the problem becomes almost impossible.

Some boroughs have already undertaken work to map accessible housing need. We heard from Adam Driscoll, Housing Transformation Manager, London Borough of Barnet, that the borough had recently completed a housing needs assessment based on a methodology developed by the Housing Learning and Improvement Network (LIN).¹⁵ This calculated the projected need for accessible housing in the borough to 2039. However, this kind of understanding is not consistent across boroughs. We heard from Fara Muneer, Head of Business Development, CAE, that estimating unmet accessible housing need is “really difficult” because of a lack of consistent data coming out of London boroughs.¹⁶

A lack of data undermines effective oversight and signals the issue is not being treated as a priority. The GLA must play a greater role in driving for consistent pan-London data, identifying knowledge gaps and commissioning relevant research. In recognition of the work already undertaken by boroughs such as Barnet and by the Housing LIN, the GLA should work closely with these partners to ensure that needs assessments at regional and local authority level are aligned.

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.

Lack of accessible new build homes

There was broad consensus from the Deaf and Disabled representatives, local authority, housing association and GLA stakeholders that we heard from that there are simply not enough affordable, accessible homes being built in London to meet demand.

The London Plan stipulates that 90 per cent of new build homes meet M4(2) accessible and adaptable standards, while the other 10 per cent meet M4(3) wheelchair user standards. Despite the London Plan’s clear requirements, data shows a decline in compliance over the past five years. In 2020–21, 53 per cent of new build completions were M4(2) compliant. By 2024–25, this had fallen to 23 per cent.¹⁷ We were told by the GLA that:

“a lot of this is due to a move to a different system of recording compliance through the Planning Datahub. It is the recording of the homes that is not happening in a consistent

¹⁴ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.2

¹⁵ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.2

¹⁶ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.1

¹⁷ GLA, [Accessible residential dwellings – completions](#), accessed 1 July 2025

way, and we think it is being underreported. I understand colleagues are working and liaising with boroughs to try to improve this.”¹⁸

The Planning London Datahub system has been in place for five years. It is concerning that after this time, it is still not fit for purpose as a tool for reporting on accessibility. While we heard from the GLA that “the quality of the data is almost certainly going to improve”,¹⁹ we received no clear explanation as to how this will be achieved. As such, we are not convinced that there is an adequate plan in place to improve data collection and accuracy on the accessibility of new build approvals and completions. Without clear, consistent and transparent data, performance against London Plan targets cannot be measured, rendering those targets effectively meaningless.

Moreover, the GLA was unable to provide an estimate of what it believes the real level of compliance is. Without this, it is impossible to verify that the issue is solely one of inconsistent data. Indeed, we heard several concerns that compliance presents a real issue. For example, Fara Muneer, Head of Business Development, CAE, told us that “the challenge for the GLA in terms of the London Plan is whether it is being followed.”²⁰

At the root of the problem of compliance is a lack of accountability and monitoring. We heard that this is undermining delivery of accessible homes, manifesting either in accessible homes that do not materialise or that are delivered to a standard that is no longer accessible. Hallie Banish, Campaigns and Communications Manager, Ruils, told us:

“There seems to be a lack of accountability for the delivery of accessible homes, particularly when we are seeing on the ground big promises of developments delivering a certain percentage of accessible homes in their new projects, but the reality of that, when those projects are finished, does not match what has been promised. We are seeing this time and time again.”²¹

She added that the finished properties are often not at a standard that would be signed off by independent accessibility experts. This was echoed by Suzanne Iwai, Disabled co-producer, who as part of Hammersmith and Fulham’s Inclusive Design Review Panel (IDRP) sees first proposals of accessible new builds and visits some of the completed properties. Suzanne emphasised that increased involvement of access auditors like herself in inspecting finished properties could help ensure they are genuinely accessible before people move in.²² The IDRP provides a model for this; however, it is not currently replicated across London. Sharing learning from the IDPR could support other boroughs to improve inclusive design standards through the adoption of similar approaches.

In some cases, we heard of private developers using viability assessments to challenge the London Plan stipulations on accessibility. Laura Vicinanza, Senior Policy and Stakeholder Engagement Manager, Inclusion London told us that:

“a lot of developers are arguing that it is not financially viable to build homes, not just that are affordable, but also accessible. Therefore, they cut corners on the design of accessible homes, and you have got local authorities, on the other hand, who do not

¹⁸ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.12

¹⁹ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.14

²⁰ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.9

²¹ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.9

²² London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.11

have often the skills, but also the capacity to go and challenge these viability appraisals, which are quite technical.”²³

We also heard positive examples of developers being held to account. Southwark Council charge developers a penalty if they do not deliver M4(3) homes; the funds raised through this scheme are then used to build wheelchair user homes elsewhere.²⁴ We believe the GLA could play a part in sharing this kind of best practice and encouraging its consistent application across boroughs.

More robust monitoring is required from the GLA to ensure that developers are meeting London Plan targets or are being held to account when they are not. To do this, the GLA must resolve the current data issues around accessibility to ensure a clear and accurate picture of new build compliance in London.

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.

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.

Affordability of accessible homes

Disabled people are more likely to face challenges finding affordable housing than non-Disabled people. A 2023 Office for National Statistics survey found that 53 per cent of Disabled Londoners, compared to 44 per cent of non-Disabled Londoners, reported that they found it difficult to afford their rent or mortgage.²⁵ DDPOs such as Inclusion London have called for a greater focus on affordable housing tenures, such as social rent, because the shortage of accessible housing is particularly acute in this sector.²⁶

We heard from Adam Driscoll, Housing Transformation Manager, London Borough of Barnet, that a challenge facing boroughs in delivering accessible homes is that sometimes units that are being delivered are not the right type or tenure to meet the areas of greatest need. For example, he cited units that are wheelchair adaptable rather than accessible or shared ownership rather than social rent tenure. He concluded that “a much clearer direction around tenure for accessible units” would be “very helpful”.²⁷

There are no targets under the current AHP 2021-26 for accessible homes. Velvet Dibley, Senior Policy Officer (Housing), GLA, told us that 1,244 completions under the AHP 2021-26 currently meet M4(2) standards while 280 are M4(3) wheelchair standard.²⁸ Data released by

²³ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.17

²⁴ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.17

²⁵ ONS, [Impact of increased cost of living on adults across Great Britain](#), July to October 2023 edition

²⁶ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.7

²⁷ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.9

²⁸ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.6

the GLA up to March 2025 recorded 871 completions under the AHP 2021-26 in total,²⁹ so it is not clear what percentage of homes completed under the programme this represents. The Committee requires further clarity on why the figures provided by the GLA do not align with its own published statistics. It also requests further detail on the number of these completions that were homes acquired under the Council Homes Acquisition Programme and subsequently made accessible.

Velvet Dibley added that while “I cannot speak necessarily to targets within the next AHP as those discussions are still live”, “in terms of raw numbers, we will definitely be expecting to see an increase in delivery of accessible, affordable homes through the next AHP.”³⁰ We welcome the expectation that the next AHP will deliver more accessible, affordable homes. To ensure this remains a priority, specific targets on accessible and affordable homes should be built into the next AHP framework. Such targets not only set a clear direction and intention, they also facilitate effective monitoring and reporting.

However, such targets need to be considered in the context of appropriate funding and support. Adam Driscoll, London Borough of Barnet, highlighted the need to “recognis[e] through social housing grants that there are additional costs [for accessible housing]”.³¹ For example, we heard that because M4(3) homes are larger, delivering these units could have knock on effects on the tenure and unit sizes of a development. Grants programmes must be designed in a way that ensures that boroughs can manage these different factors.

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.

Consultation and co-production

Deaf and Disabled Londoners live with the worst consequences of London’s lack of accessible housing – yet their voices are not being heard. We heard from DDPOs that they are not meaningfully consulted by the GLA on accessible housing. For example, Laura Vicinanza, Senior Policy and Stakeholder Engagement Manager, Inclusion London said that some of the GLA’s consultation “feels quite tokenistic to us. It feels a bit a tick-box exercise.”³²

This is deeply concerning. It is understandable that Deaf and Disabled people do not feel meaningfully engaged when the consultation processes themselves are sometimes inaccessible. We were told by Inclusion London that:

“the *Towards the New London Plan* consultation was not accessible. There were no alternative formats available, no easy read, no British Sign Language [BSL] version, no large print. How do you expect people to understand what your policy proposals are and respond?”³³

²⁹ GLA, [Affordable Housing Statistics](#), May 2025

³⁰ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.6

³¹ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.21

³² London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.14

³³ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.14

While an overview BSL video was published online during the consultation process, there is not a full BSL translation of the consultation document. Lisa Fairmaner, Head of London Plan Strategic Planning, GLA, said that the GLA had not been able to engage with Deaf Londoners through its consultation events.³⁴ She added that easy-read versions are being created and a separate consultation will be run to gather the views of Deaf and Disabled Londoners. We welcome this commitment to further consultation. However, in future, these formats must be built into any consultation from the beginning rather than as an afterthought.

More fundamentally, providing accessible consultation formats is the bare minimum of engagement. We heard from Hallie Banish that:

“It is not even about the materials just being accessible, but it is about the way in which you share those materials [...] Putting just a singular post out on social media, I am sorry, that is not good enough. That will not reach the people that you are wanting to consult with.”³⁵

In general, there was a scepticism among Deaf and Disabled representatives that we heard from about current methods of consultation, and a desire for a more meaningful process of engagement. Inclusion London told us “We want co-production. We do not want consultation, especially we do not want consultation after a decision has been made.”³⁶ We are clear that to effectively deliver homes that meet the needs of Deaf and Disabled Londoners, it is vital that they are engaged as equal partners in this process.

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.

Challenges in adapting properties

We heard from both Adam Driscoll, Housing Transformation Manager, London Borough of Barnet and Hallie Banish, Campaigns and Communications Manager, Ruils, about challenges in adapting existing properties to higher levels of accessibility. Adam Driscoll told us that converting a unit from M4(2) to M4(3) was “very difficult” due to limitations on which units could be converted, and the cost of conversions.³⁷

Disabled Facilities Grants (DFGs) are local authority grants to help Disabled people with the cost of essential home adaptations.³⁸ However, both Adam Driscoll and Hallie Banish told us that they are not an effective way to deliver accessible homes. Hallie Banish said:

“we are seeing a massive trend where people are put in adaptable homes, and then they have to go through the Disabled Facilities Grant process, which is not an accessible process by any means. It can take one, two, three years for those adaptable homes to be adapted to meet the needs. If the homes were made to the highest accessibility standard, the wheelchair user standard, in the first place, people would not have to then

³⁴ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.5

³⁵ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.14

³⁶ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.15

³⁷ London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.18

³⁸ UK Government, [Disabled Facilities Grants](#)

go back through this very costly, very demanding process, which often they cannot do independently.”³⁹

We understand that the Planning Practice Guidance, supporting the National Planning Policy Framework (NPPF), states that a local plan’s policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.⁴⁰ However, given the extra costs and delays involved in adapting properties, we believe a greater proportion of new build homes should be homes that are ready to be occupied by a wheelchair user.

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.

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.

Challenges in allocating accessible housing

Where accessible housing does exist, we heard that processes for finding it can be complex and difficult to navigate. Hallie Banish, Campaigns and Communications Manager, Ruils, told us that Ruils was “absolutely inundated” with people who cannot navigate the current systems used to access accessible housing.⁴¹ This not only has an impact on Deaf and Disabled Londoners, but on support systems in the voluntary sector which are “under immense stress and pressure” as a result.

The Ministry of Housing, Communities and Local Government’s statutory allocations code of guidance reminds local authorities that they have a duty to provide applicants with information about whether accommodation appropriate to their needs is likely to be made available to them. London boroughs take variable approaches to the allocation and letting of adapted and accessible properties. Fara Muneer, CAE, emphasised the need for a simple, transparent system, saying “We have always advocated for an accessible homes register so that people who need those homes know exactly where to go.”⁴² Currently, fewer than half of London Boroughs are operating accessible housing registers, which record properties adapted or designed to enable Disabled people to live independently.⁴³

The GLA told us that if boroughs were to collectively approach it to request support around allocations, it would be receptive to this. We urge a more proactive approach. While we understand that the GLA does not have a statutory role in allocations, we believe that it does have a role to play in sharing best practice and ensuring that Deaf and Disabled Londoners can access information about the housing available to them.

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

³⁹ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.17

⁴⁰ UK Government, [Housing: optional technical standards](#), March 2015

⁴¹ London Assembly, [Housing Committee Transcript Panel 1](#), 24 June 2025, p.5

⁴² London Assembly, [Housing Committee Transcript Panel 2](#), 24 June 2025, p.10

⁴³ MHCLG, [Local Authority Housing Statistics open data \(accessible version\)](#), accessed 1 July 2025

should proactively investigate how it can facilitate the sharing of knowledge and best practice across boroughs.

The Committee would welcome a response to this letter by 7 October 2025. Please send your response by email to the Committee's Clerk, Diane Richards (Diane.Richards@london.gov.uk).

Yours,

A handwritten signature in dark ink, reading "Zoë Garbett". The signature is written in a cursive style with a large, stylized 'Z'.

Zoë Garbett AM
Chair of the Housing Committee