

London Plan Chapter 3

'DELIVERING THE HOMES AND NEIGHBOURHOODS LONDONERS NEED'

HN1 Increasing stock, HN2 Protecting and reshaping housing, HN3 Affordable housing, HN4 Gypsy and traveller, HN5 Specialist, HN6 Build to rent, HN7 Housing size and mix, HN8 Design, HN9 Accessible housing

HN1 Increasing London's Housing Stock

Response by Just Space www.justspace.org.uk

Just Space, a pan-London informal alliance of community groups, campaigns and concerned independent organisations, often working with the Bartlett School of Planning, aims to improve public participation in planning and make policy fairer towards communities in a system dominated by the interests of developers. This submission is the result of 3 years of consultation in preparation for the draft Plan, with the participation of dozens of groups, including three conferences and the production of an [Alternative London Plan for a Caring City](#).

We request to speak at the Examination.

The policy is unsound since it fails to address the stated aim of the policy. It is not positively prepared, failing to address objectively assessed need.

The policy aim is “to deliver homes that contribute towards meeting London’s housing need”. But the policy focuses on a simplistic target of 558,451 of homes over 10 years, regardless of size and tenure, and clearly doesn’t meet the acute need identified in the SHMA for low-cost rent housing in particular. The policy expressly fails to meet need, with even the strategic target of 50% well below the percentage of affordable housing identified in the SHMA (65% against the 55,800pa target), and no evidenced route to achieving the strategic target, given reductions in policy targets leaving all of them below 50%, and no evidence of testing of how this will impact delivery.

The most pressing need identified in the SHMA is for 31,300 new low-cost rent homes (net) annually, and a further 14,200 intermediate (shared ownership, London Living Rent etc), totalling 45,500 new affordable homes annually. This figure would deal with the backlog of acute housing need over 20 years (74,900 households¹ in temporary accommodation, 13,200 people sleeping rough each year²; there are also there are also more than **330,000 households on London's social housing waiting lists**,. The need for family-sized affordable is particularly acute, reflecting high levels of overcrowding and a chronic shortage of larger affordable homes.

The 45,500 homes needed annually to deal with the acute need is more than all the housing which has been delivered for many years, and would require significant increases in public investment³. London cannot resolve this issue alone, given the massive centralising constraints placed upon the boroughs (who have massive funding constraints and are largely verging on bankruptcy, due in particular to the temporary accommodation costs, housing repair bills, and a significant portion of the HRA settling claims about disrepair) and strategic government (who cannot even develop housing). And yet the government is largely demanding just that - they want the £11.7bn housing grant to be spread out over a decade, to just about fund one year’s supply of the 45,500 homes needed.

¹ 74,860 according to Trust for London's analysis of official homelessness statistics

² through the CHAIN monitoring system

³ SHMA, 17

Or, to put it another way, the government is providing funds to address just 10% of current need annually. Are they expecting the planning system to arrange policy and decisions in order to magic up another circa 41,000 affordable homes needed (the remaining 90%) – with a significant proportion of family accommodation? That would be absurd.

Clearly, in demanding an undeliverable and simplistic total of 880,000 homes, the Government appears less concerned with addressing London's acute housing needs than with pursuing a growth-led housing target⁴ intended to support wider economic objectives and compliance with its fiscal rules.

The policy of setting the crude targets set out in Table 3.1 clearly does not address meeting London's housing need, even in a roundabout way, since even if circa 56,000 homes were built annually – at greater levels than has been achieved in at least 50 years – with 33% affordable (given the lower thresholds proposed for the Fast Track for outer London and middling London, and the viability claims made by many developers), it would provide circa 19,000 affordable homes, not the 45,500 affordable homes identified as required annually in the SHMA, or even the 38,000 affordable homes needed if 66% of all homes built were affordable at this rate, according to the SHMA (and referred to at 3.7) or even the strategic target set by the Mayor at 3.8 of 50% affordable.

It is imperative to distinguish need from demand, as is pointed out in the SHMA. There would appear to be a very high level of demand, given high prices – but the demand is for a housing product rather than as homes: as an investment to hold wealth; as a second home; as accommodation to rent out for a good return. As the SHMA comments:

“near places of great natural beauty there is a lot of demand for very few homes, and it is difficult to build new ones. Demand is still high, but supply cannot meet it, driving up prices.”⁵

London acts in a similar way, particularly central London and even inner London. A lot of people would like to live here, but it would be counterproductive to build all the homes to meet this huge demand, since London would become an unliveable wren devoid of daylight. House prices and rents are an indication of demand (and the control of the market by housebuilder oligopolies), not need. Simply building market housing responds largely to demand, not need. The impact of 1.3m new homes will only reduce house prices by 0.8% according to the OBR (and there are many other studies demonstrating such claims). Wasting precious land on meeting the bottomless demand acts against the first Good Growth objective ‘Making the best use of land’.

These targets are clearly unrealistic. What is the effect of setting such unrealistic targets? All but five of the boroughs have failed the government's Housing Delivery Test and are on various special measures, including the ‘tilted balance’. The result is that they are tilted towards approving harmful proposals which do virtually nothing for addressing acute housing need but contribute considerably to the targets. For example, a scheme in Vauxhall⁶ recently approved by Lambeth proposes 1,097

⁴ “The new targets will boost housebuilding in areas most in need, to help more people buy their own homes, and help drive growth - making everyone in the country better off.” Our Plan to Build New Homes, HM Govt, 30/07/24

⁵ SHMA, 25

⁶ Lambeth Council 25/03113/EIAFUL

residential dwellings, 1,164 co-living dwellings, 699 student beds, 250 hotel beds (plus some flexible retail, offices, cinema and community/medical) with only 122 low-cost rent homes (6%) but £80m PIL for off-site affordable housing – in the form of 6 towers of up to 230m which cause multiple heritage harms, including to the Westminster World Heritage Site, as well as harms to amenity (daylight and sunlight), which was approved on balance explicitly because it would meet of a year of Lambeth's annual housing target.

Alongside an unchanged viability regime, these unrealistic targets will result in empowering developers to justify development with significant planning harms and reductions in affordable housing and other benefits in the name of meeting targets.

The target-led approach fails to acknowledge the inability of planning system to secure delivery. The SHLAA itself acknowledges that existing permissions account for around half of target. The focus on densification overlooks the evidence in the SHLAA Table 6-1 that densification presents particularly strong viability challenges that will limit delivery.

Finally, the over-riding focus on targets fails to acknowledge the ecological impact of densification, in terms of increased construction and operational carbon impacts.

HN2 Protecting and Reshaping Housing

Response by Just Space www.justspace.org.uk

Just Space, a pan-London informal alliance of community groups, campaigns and concerned independent organisations, often working with the Bartlett School of Planning, aims to improve public participation in planning and make policy fairer towards communities in a system dominated by the interests of developers. This submission is the result of 3 years of consultation in preparation for the draft Plan, with the participation of dozens of groups, including three conferences and the production of an [Alternative London Plan for a Caring City](#).

We request to speak at the Examination.

We support the aims of the policy, but it is unsound because some of it is insufficiently evidenced.

Primarily our concern is with so-called estate regeneration projects. Currently over 35,000 homes across at least 139 council estates are threatened with redevelopment in such projects¹. There is strong evidence of multiple problems, their social harm and their miserable record of successfully increasing the stock of social housing. People living on these estates can be locked into uncertain processes which can take over 30 years to deliver² often with a double move and no right to return for those on social rent, and with leaseholders a limited financial compensation which disables any capacity to return. Just Space together with London Tenants Federation run [ESTATE WATCH](#) to track this process and have published [The ALTERNATIVE Good Practice Guide to Estate Regeneration](#).

Estate regeneration follows the logic of a financialised planning system, which prioritises financial viability over social benefit. The Mayor's funding currently focuses on new build housing stock rather than on retrofitting the existing housing stock, making it more viable for local authorities to demolish the existing homes and build new ones. An added difficulty is the VAT cost for refurbishment/retrofit, which does not exist in new build. The result of the current funding system for social housing is that it prioritises demolition and redevelopment over refurbishment/retrofit.

While retrofit and infill can be a better option than demolition, in terms of both social cost and carbon cost, it needs to be done in collaboration with residents and ensure that there is no loss of open spaces, community spaces and other social infrastructure – and when densifying needs an overall increase of social infrastructure that is proportionate to that densification. Social infrastructures – such as community spaces, libraries, and spaces where people can meet and foster social relations – are key for creating more resilient communities, particularly on the ongoing climate and health emergencies. The loss of these community spaces does not improve people's lives, but makes it much more challenging, particularly to communities at risk.

There should be a policy presumption against demolition and in favour of refurbishment. Redevelopment is routinely presented to residents as the only option i.e. there is no alternative. The

¹ Estatewatch: <https://estatewatch.london/> - Monitoring **London estates** under threat of demolition by Just Space and London Tenants Federation

² Clapham Park Estate was granted outline permission for widespread redevelopment in 2005, and transferred to a RP to develop out in 2006; 20 years later they are only halfway through the project, with homes vacated and demolished over a decade ago but still not replaced, and over 1,000 former council homes occupied by 'guardians' on 28 days notice for over 7 years. Kentish Town East was consulted a decade ago, but work still hasn't started and the most recent programme proposes to conclude in 2040.

requirement in the current LP for boroughs and housing associations to always consider alternative options³ has been dropped, despite the evidence that in cases where alternatives to demolition have been professionally explored and presented, residents have overwhelmingly backed refurbishment, developing in some cases their own community-led plans. For example, the St. Raphael's estate in Brent, Cressingham Gardens in Lambeth or the Alton estate in Wandsworth, or more historical examples such as Walerton and Elgin estates in north Westminster. These community-led proposals often include considerably more social housing than the redevelopment alternative.⁴ Protecting and reshaping housing should include community-led plan making options which yield better design results, increased social housing proposals, improved sense of belonging and community involvement.

The removal of current LP Part D protections around social rent housing being fully replaced with social rent housing and integrated into the development are not justified – no evidence is provided as to their efficacy. The right of return has also been excised, but the analysis of estate regeneration across previous LP period shows displacement and delay and a failure to return in practice. There is no assessment or acknowledgement of this and its social and equalities impacts.

Part A(2) proposes replacement of lost social rent in terms of floorspace, which could lead to net loss in units (as the supporting paragraphs acknowledge). There should be stronger protection insisting on the same number of units or at least habitable rooms.

There is also a failure to acknowledge or consider the disbenefits resulting in the shift from council housing to other forms of social rent housing, and the subsequent loss in secure long-term tenancy.

There must also be some form of protection or support for non-social rent tenants displaced as a result of development and unable to purchase accommodation in the area (including the new homes) costing many times more than the financial compensation offered.

Part B would allow the loss of NSC accommodation if “identified as surplus”. This is an absurd proposition in the depths of the housing affordability catastrophe. At the very least such accommodation should be re-purposed or re-provided as housing.

Part C seeks to regulate demolition and replacement of affordable housing, but needs to be stronger. As already observed, councils are under a considerable financial and funding imperative to choose redevelopment, and have made very little effort to consider alternative options openly or in any detail. Good planning policy should not be driven by current funding arrangements. The policy lacks sufficient detail to be meaningful and measurable in practice.

More detail is required as to what must be included in the “robust assessment”, including what “alternative options” must be included. This must include a detailed breakdown of refurbishment and infill, and include an assessment of the social impact (including equalities) and the embodied and operational carbon impact, and a method of comparison.

The requirement to “maximise the provision of additional affordable housing” needs to be clarified and made more enforceable. When can it be said that the provision of affordable housing is not

³ Policy H8 part (C)

⁴ E.g. the alternative community masterplan for Woolwich Dockyard could provide 300 more social rent homes than its redevelopment, which would create over 1,000 additional market homes

being sufficiently maximised? Finally, the current requirement to follow the Viability Tested Route⁵ is dropped, and the Fast Track route is allowed in certain circumstances. This is not justified.

⁵ Current LP Policy H8 part E

HN3 Delivering Affordable Housing

Response by Just Space www.justspace.org.uk

Just Space, a pan-London informal alliance of community groups, campaigns and concerned independent organisations, often working with the Bartlett School of Planning, aims to improve public participation in planning and make policy fairer towards communities in a system dominated by the interests of developers. This submission is the result of 3 years of consultation in preparation for the draft Plan, with the participation of dozens of groups, including three conferences and the production of an [Alternative London Plan for a Caring City](#).

We request to speak at the Examination.

We find Policy HN3 to be unsound as it is clearly not the most effective or justified option and does not meet the needs of those who need affordable housing. There is no analysis provided of the current problems in the draft London Plan or its evidence base, nor of the failure of existing London Plan policies to resolve those problems.

For those households with low incomes (and even median incomes given current market rent levels) there is a huge shortfall of genuinely affordable housing, particularly of family-sized affordable homes: “the need for family-sized affordable housing is acute. Within the low cost rent sector, there is a critical requirement for homes of 3 bedrooms and larger to address severe overcrowding and rehouse families currently in unsuitable temporary accommodation”.¹

The SHMA concludes that even if London were to continue on its current trend of delivering around 22,000 homes per year, we would need “approximately 15,400 low-cost rented homes per year (accounting for 68% of the total need), driven by the backlog of homeless households that must be addressed regardless of future growth trends.”² At the other end, if London were to deliver an unprecedented 89,000 homes p.a. “affordable housing accounts for 51% of total need. The combined requirement for low-cost rent and intermediate tenures is approximately 45,500 homes per year.”³ This would require significant increases in public investment⁴. As the draft London Plan acknowledges, “While the Mayor has secured up to £11.7bn in grant funding 2026-36 this is still insufficient to meet the scale of the housing delivery required”⁵, let alone the necessary investment in additional transport infrastructure.

Achieving additional genuinely affordable housing to meet need through requiring general housing development to provide a significant proportion of affordable housing has been an aspiration since at least the first London Plan 2004. A strategic target of 50% of all new homes to be affordable was also set. How has this approach fared over 22 years? By any measure it has failed. Homelessness, temporary accommodation, overcrowding have all increased. The amount of money spent by the boroughs on temporary accommodation is bankrupting them. House prices and rents have far outpaced incomes; purchasing and renting homes have become increasingly unaffordable. Families

¹ Ibid, 6

² SHMA Table 2, para 14

³ SHMA, 4

⁴ SHMA, 17

⁵ Draft London Plan 1.22

unable to afford living in London have moved out and school rolls have crashed. Household formation has been significantly constrained, contributing to rapidly falling birth rates. And at the same time we have 100,000 empty homes, and many more under-occupied as people use property as a safe place to store wealth, many in new builds. Developers are reporting a glut of one and two bed market homes in areas like Vauxhall, leading not to lower prices but to slower absorption rates (i.e. how quickly homes can be sold in a market). This is a sign if ever one was needed that the housing market pricing mechanism does not work. Starts and completions have slowed, and we have over 250,000 homes approved but unbuilt. To continue with this approach – setting an unachievable target unanchored in need or affordability and tailor other key planning policies to serve that end (such as industrial land release) – is not only unsound, it is wholly irrational.

There is no analysis provided in the draft London Plan (or its evidence base) of the current problems nor of the failure of existing London Plan policies to resolve those problems. Nevertheless, even as we expect ever smaller proportions of the affordable housing which is the over-riding need (as a result of the ‘emergency measures’ as well as issues affecting viability) the draft London Plan not only irrationally continues with the approach, it doubles down on it, proposing a series of highly damaging strategic planning policies in an attempt to unlock delivery, but without any analysis of why delivery has consistently failed to provide the affordable homes that London needs.

In setting the overall ambition and objectives in the opening chapter the centrality of delivering affordable housing is admitted:

“The delivery of affordable housing is not only essential to meet Londoners’ needs, but also to support housing delivery overall given its role in reducing exposure to absorption rate issues [how quickly homes are sold] which act as a significant limitation on the volume and speed of market housing delivery. Given the scale of housing need, significant increases in funding for affordable housing grant must be made available to bolster supply in both the 10 year and longer term period.”⁶

Yet policy HN3 expressly fails to meet the numbers of genuinely affordable homes needed, according to the SHMA, and specifically the proportion of genuinely affordable housing identified (65% of the 55,800 pa target). The strategic target⁷ of 50% falls well below the percentage needed; yet there is no evidenced route to achieving the strategic target, given reductions in policy targets leaving all of them below 50% (with requirements for public land reduced to 40%, the Threshold Approach in outer London is reduced to 20%, and in mid-London 25%)

The spatial component is potentially disastrous for mixed and balanced communities, with lower requirements in suburban areas where there are already much lower proportions of affordable housing (and land is cheaper), whilst policy forces high-density high-value development into central and inner London, where taller buildings also attract prohibitive service charges and scandalously increasing ground rents. This can only exacerbate existing inequalities and create a more divided city. Part J allows developers to provide off-site where more AH can be provided. With cheaper land and construction costs in poorer areas, this will again undermine the objective of mixed and balance communities, and will exacerbate existing inequalities.

The affordable housing requirement on public land is reduced to 40%, or 25% where there is significant transport or health infrastructure proposed, or a specific agreement with the Mayor. This is unjustified and unacceptable. The sale of public land for such limited public benefit is not justified.

⁶ 1.22

⁷ Para 3.8

There is no acknowledgement that smaller amounts of affordable housing are less attractive to Registered Providers. Reducing the targets will lead to more situations where no one wants to take on the affordable housing, in most cases with a s106 provision allowing for eventual sale as market housing. Policy should acknowledge that a low level of affordable housing can be considered a ground for refusal, especially where there is a particularly high need identified locally.

There is no evidence of testing how this will impact delivery, both generally and in terms of affordable housing. Viability varies greatly within boroughs and based on site-specific constraints. Viability can also change over time. There is no assessment of the potential that we are at the bottom of a cycle and viability may improve; reduced targets would lead to significant under-capturing. The evidence provided in the SHLAA is that reducing policy requirements doesn't improve viability: *"The principal viability challenge remains the relationship between development values, construction costs, finance costs and sales absorption rates, particularly for taller development in lower value areas. As such, reducing individual policy requirements would have only a limited effect in many cases and would not fundamentally alter the current viability position across Value Bands E and F."*⁸

Furthermore, as admitted at **para 3.55**, providing higher levels of affordable housing de-risks projects potentially suffering low absorption rates, and should be therefore a key strategy in raising delivery. The various reductions in affordable housing requirements, introduced to aid viability defeats the purpose of development in the first place, (in the geographically differentiated Threshold Approach, and in the reduction from 50% to 40% on public sector land), since it risks exacerbating inequalities and have adverse socio-economic effects in the most deprived areas, with growing poverty and income inequality across London, contrary to the Good Growth ambition for socially inclusive development⁹. But it is also not the most efficient approach, since affordable housing is not identified as main viability issue, and affordable housing can support delivery¹⁰ e.g. through funding/finance opportunities and guaranteed early sales¹¹; conversely, increased proportions of market housing bring delivery issues (lack of demand, absorption rates).

Furthermore, the GLA evidence base clearly shows that lower-scale development is generally more viable (see SHLAA table 6-1). Viability is not the same as profitability. Higher density development is often less viable whilst generating a larger profit; requiring increased density despite it being less viable only maintains high developer profits without a consequent delivery in affordable housing and other public benefit.

Policy HN3 is clearly not the most effective or justified option. Given the evidence, and assuming the Mayor's overall ambition to build more homes (and a secondary objective of maximising the amount of affordable homes delivered), pursuing lower-scale development at mid-rise density, with a minimum 35% Threshold Approach would be more viable and more deliverable – particularly if the Mayor persuaded govt to increase the £11.7 billion in govt grant funding, which he states is severely "insufficient to meet the scale of housing delivery required".¹² Were the grant to rise significantly (and it may do under the new government) the approach proposed in the draft London Plan would become increasingly the more ineffective option. The Mayor rejects this approach on the grounds of

⁸ SHLAA 6.15

⁹ 1.7

¹⁰ This is clearly stated at 1.22 of the introduction

¹¹ SHLAA, 6.13

¹² 1.22

opportunity cost and making the best use of land,¹³ despite it being the most effective way to unlock land and deliver development, whilst still ensuring the maximum supply of affordable housing.

The government definition of affordable housing remains deeply flawed: anything up to 80% of market rent.¹⁴ It should be 30% of income (net benefits). The focus of the Plan should be on achieving maximum social housing.

Part H

We strongly support part H regarding viability reviews¹⁵, but part I seems to conflict with this in cases where amendments are made to a phased scheme which has started on site. We also support viability reviews set out in part N.

Part J (i) runs counter to the fundamental requirement for mixed and balanced communities set out in NPPF HO8 part 1(b)

Part J (iii) is effectively unenforceable: local authorities themselves do not keep track of the relationship between payment-in-lieu income and its eventual settlement, perhaps a decade later, on a series of projects – and they have every incentive not to do so. To achieve this would require a centralised GLA payment-in-lieu register.

Part P seeks to tackle an increasingly common practice: a housing development which causes some harm is approved on balance due to the significant weight given to the affordable housing promised, but when amendments are made to reduce the proportion of affordable housing, the entire application isn't reassessed in the round, but the principle of the acceptability of the harms is often taken to have been established, and only the specific amendments are considered. This is a very unsatisfactory situation. Wherever an applicant seeks to make such amendments it should be effectively considered by the decision-maker as a fresh application (with the permission as a fallback).

With regard to affordable housing there is a requirement¹⁶ that annual housing costs (including mortgage, rent and service charge) are no greater than 40% of net household income. This is positive, but more is required to ensure this is enforceable in practice. How is this expected to be monitored? Is there any analysis on costs under AH homes delivered under previous London Plan period?

¹³ 3.55 and SHLAA 10.12

¹⁴ In places like Vauxhall that can be over £3,000 pcm

¹⁵ And its justification at 3.38

¹⁶ 3.49

HN4 Gypsy and Traveller Accommodation

Response by Just Space www.justspace.org.uk

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We request to speak at the Examination.

The policy is unsound because the evidence base has considerable faults. It is also incoherent in that there is a potential clash between densification policies and this policy.

The evidence base for this policy is the London Gypsy and Traveller Accommodation Needs Assessment (GTANA) 2025. It provides the evidential base for meeting housing needs of Romany Gypsies, European Roma, Irish and Scottish Travellers, and travelling showpeople for the next ten years. The Introduction chapter of the GTANA 2025 notes that “some individual members of the GTANA Steering Group do not necessarily endorse all aspects of the methodology or GTANA findings.” [London Gypsies and Travellers](#), [Roma Support Group](#), and [Southwark Travellers Action Group](#) clarified that they explicitly object to the methodology and the findings. Community representatives and experts on the London GTANA 2025 steering group raised serious concerns about the methodology and accuracy of the research:

- The Census figures used for Gypsy, Roma and Traveller populations of London are known undercounts.
- The identified housing need arising from overcrowding in Roma households does not reflect the most up-to-date information.
- Most of Gypsies and Travellers’ cultural right and expressed preference to move out of standard housing and into communal sites is discounted.

The consequence of these problems is a reduced measure of housing need.

Plan-making

Part A (4) this should happen with every Local Plan review

Part A (5) ... replace ~~where there is scope to do so~~ with *that are located in areas with unmet need for Gypsy and Traveller accommodation*

Add to (A) *that caravans are highly flammable, so annual fire safety inspections of sites are required, along with fire break measures*

Part B could specify that TfL safeguarded land could be used for this purpose

Development management

Part D Replacement land should be secured and available for use prior to any proposals to move from existing sites.

ADD that air and noise pollution should be taken into account when planning new culturally suitable homes, where outdoor communal spaces are the norm for daily activities, and mitigation measures introduced.

Gypsies and Travellers suffer from high rates of disability, neurodivergence, and chronic mental health conditions, according to the ONS and the NHS Race Observatory. The effects of the health situation can be attenuated by appropriate planning, design, and development implementation.

Therefore suggested addition:

All amenity blocks should be wheelchair accessible, and accessible to those with sensory impairments, neurodivergence and mental health conditions, with child-safe windows and site gates. The GLA could consider applying a clear definition of accessibility to planning for affordable housing in general and social rented housing in particular, to address mobility impairments as well as sensory impairments and neurodivergence, as recommended by the BSI standard Design for the Mind - Neurodiversity and the Built Environment (PAS 6463).

ADD: *Gypsy and Traveller accommodation assessments in London will be based on the definition of Gypsies and Travellers as*

(a) Persons of a nomadic habit of life, whatever their race or origin, including:

(i) Persons who, on grounds only of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently, and

(ii) Members of an organised group of travelling show people or circus people (whether or not travelling together as such); and

(b) All other persons with a cultural tradition of nomadism or of living in a mobile home.

The Plan should ensure that the emphasis on land optimisation and density does not undermine the ability of boroughs to deliver the required pitches. An exception to the density rules should be made to protect existing sites and to allow development of new culturally suitable accommodation, including near train stations.

The NPPF specifically favours demonstrable five-year supplies of deliverable Gypsy and Traveller sites on Green Belt¹ and state that gypsy and traveller sites are not inappropriate for the Green Belt.² The London Plan should set a regional strategy that would pragmatically redistribute part of the needed supply of Gypsy and Traveller pitches from the inner boroughs towards the outer boroughs, in co-ordination with the communities affected. "Greybelt" lands are typically locations that do not contribute to the purposes of the Green Belt and also locations that Gypsies and Travellers have often, historically, made into homes. London Gypsies and Travellers advocates for caution in the

¹ GB3.3 of the NPPF 2026

² GB7 and footnote 41

deregulation of planning in Green Belt (and MOL) areas, noting that Gypsy and Traveller sites in their modern designs do not disrupt the character of the Green Belt, because they do not obstruct the horizon and can be designed to increase local biodiversity, and to blend in with green surroundings, and so should be viewed as suitable development in the Green Belt where standard housing may not be suitable.

To prevent the forced assimilation of households following nomadic ways of life, the London Plan should make it compulsory to meet transit accommodation needs. Transit sites should be planned regionally, in the outer boroughs of London, where 87 transit pitches are a minimum, translating into 4 or 5 transit pitches in each of the 20 outer boroughs. The London Plan should identify a Negotiated Stopping approach in the region, or establish negotiated protocols on TFL and other GLA-owned land.

HN5 Managing Specialist Accommodation

Response by Just Space www.justspace.org.uk

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We request to speak at the Examination.

The policy is unsound because it does not meet objective need and is not the most appropriate strategy.

There has been an over-delivery of Purpose Built Student Accommodation (PBSA) and co-living in recent years relative to conventional housing. PBSA applications have greatly increased over the past decade, and especially since Covid. For example, over 5,000 student bed spaces have been proposed or approved for North Lambeth and North Southwark over the past two years, taking up significant sites which could accommodate conventional housing. This number is almost the equivalent of the target for the whole of London - but in just two boroughs.

Given the ongoing post-Brexit financial problems and shrinking of university and colleges, this is odd. Some of these are part of a mix of accommodation in a scheme, de-risking a project by creating a range of funding opportunities and end-users. But many are standalone PBSA, and there is clearly something else going on, at the expense of the delivery of social housing.

Part A (2) encourages Local Planning Authorities to identify spatial concentrations which impact on the ability to ensure mixed and balanced neighbourhoods. This is supportable, although without greater specification as to how to quantify it would prove ineffective. This is also a high bar (how much student accommodation would overwhelm an area?). The real issue is the potential use of the site for conventional housing, in particular social housing, which should be prioritised for those uses, not PBSA. Applications for PBSA should need to demonstrate how the site is unsuitable for conventional housing – for example on very tight sites in town centres with a bustling/ noisy night-time economy.

The PBSA targets set for each borough should be taken as broad maximums – this is a relatively fixed and predictable clientele, encouraging speculative development is inappropriate, and the mechanism of requiring university support has not worked – all the thousands of PBSA in north Lambeth and North Southwark have garnered university support, as required, but there is no follow up.

PBSA should not be taken as contributing to the overall housing targets: they don't contribute towards conventional housing need, despite taking land which should be used to address that need.

Southwark Council's planning policy requires delivery of a proportion of conventional affordable housing (particularly social rent) as part of PBSA development. This has been proved effective in ensuring onsite social housing delivery.

Part C (3) We support embedding that policy in the London Plan.

The safeguards put in place in the current **London Plan Policy H15** appear to have been dropped, specifically that

- The use of the accommodation is secured for students (and not non-students)
- The majority of the bedrooms and all of the affordable accommodation is secured through a nomination agreement with one or more of the higher education providers

There is increasing over-provision for 'co-living' (LSPBSL Large Scale Purpose Built Shared Living) which does not contribute to the acute housing need of family-sized and affordable housing, wasting precious land; and while payment-in-lieu is encouraged, this is often lost in post-permission variations.

There is an absence of space standards in both PBSA and LSPBSL. This is particularly odd regarding PBSL if the argument is that this form of housing does meet a need.

HN6 Build to Rent

Response by Just Space www.justspace.org.uk

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We request to speak at the Examination.

The policy is unsound because it is internally inconsistent as well as contrary to Policy HN8 Housing Design.

The pool of social rented stock has shrunk for over 40 years through Right To Buy and demolition, while house prices have greatly increased relative to average income; along with the removal of rent controls, and until recently the absence of renters' rights, the private rental sector has swollen in London from around 9% of homes to over 30% and is overtaking the amount of social housing stock which used to dominate. This has had a damaging impact on the quality of life for one third of Londoners, who are often trapped in over-priced and unaffordable rental property which is poorly managed and not in good condition, with (until very recently, and we're yet to see the impact of the new law) uncertainty about their future. This has also had a damaging impact on the local economy, with huge proportions of household income extracted in rent which would otherwise have been spent in the local economy. The precariousness undermines employment as well as the development of community cohesion.

In many other European cities owner occupation is not such a core aspiration and renting privately is far less perilous experience than in London, but is dependent upon a culture, norms and laws which resolve the problems Londoners face. This is not something which planning can solve alone: better law and regulation is urgently required. The Build to Rent sector could play a part in that process, but there is little evidence that it is doing so.

In B(1) and B (4) There appears to be a conflict between the covenant minimum of 15 years in (1) and the 'in perpetuity' required for affordable housing in (4). Does it mean that a BTR property could be sold after 15 years as long as it was sold at an 'affordable' price? How could that price be kept affordable 'in perpetuity'?

It is not clear why the covenant is not also 'in perpetuity' – the Build to Rent product should not be able to morph into another product after 15 years.

The affordable element proposed of Discount Market Rent is simply unaffordable in large parts of central and inner London at the least: current market rents of the thousands of flats built in the VNEB Opportunity Area, for example, where housing growth has been directed, averages over £3,000 pcm, so the Discount Market Rent could be as high as £2,400 pcm. This is unaffordable to even the average income household. This wording should be removed.

In the **implementation**, the supporting text suggests that affordability can be created by reducing levels of amenity and lower maintenance provision.¹ This is alarming and runs counter to policy HN8 Housing Design, whose aim is “to ensure that new residential development is of high-quality design” and sets standards for access to light, ventilation, outside space, child playspace and so forth. To suggest and enable alternative levels of amenity and maintenance is clearly an equalities issue, disproportionately impacting on traditionally deprived groups, but would also undermine the aim of normalising this housing product.

¹ 3.88

HN7 Housing size mix

Response by Just Space www.justspace.org.uk

Just Space, a pan-London informal alliance of community groups, campaigns and concerned independent organisations, often working with the Bartlett School of Planning, aims to improve public participation in planning and make policy fairer towards communities in a system dominated by the interests of developers. This submission is the result of 3 years of consultation in preparation for the draft Plan, with the participation of dozens of groups, including three conferences and the production of an [Alternative London Plan for a Caring City](#).

We request to speak at the Examination.

The policy is unsound because not positively prepared, not justified by evidence, and not consistent with the Plan's overall aims.

The policy's aim is to "ensure that new development provides a range of housing sizes, to meet Londoners' needs and build strong and inclusive communities, without undermining viability and the ability to achieve higher housing targets". This is an odd ambition, which is not positively prepared. The second Good Growth objective is to "deliver the homes and neighbourhoods London needs" without any qualifications about viability. The SHMA evidences that London's most acute need is for genuinely affordable family housing. Nowhere does it state that London needs to hit a target – expressed in simple numbers of units, not in tenure or mix or habitable rooms. Nowhere does it propose absolute numbers trumps need.

The first part of the aim is positively prepared ("ensure that new development provides a range of housing sizes, to meet Londoners' needs and build strong and inclusive communities") but the policy fails to meet this objective, by setting neither minimum standards nor guidance on bedroom size mix, or a requirement that LPAs must do so (Part A is conditional "if preparing local policy or supplementary plans on housing size mix for affordable homes" and Part B is also conditional "Where an LPA wishes to prepare...").

This leaves open the door that no planning documents in a borough – neither the London Plan nor Local Plan – would provide policy on housing mix. How are applicants and decision-makers to be guided? With reference to evidence in the SHMA, according to C (1). It is not appropriate for applicants and decision-makers to wade through the SHMA's 96 pages in order to understand the housing size mix they should be designing or permitting. Furthermore, the SHMA was not written for that purpose: it is an assessment of need, not a policy document.

One of the scourges of London's housebuilding is that there has been a glut of 1 and 2 bedroom properties, particularly in Opportunity Areas, and a shortfall of family-sized housing, as well as a severe shortfall in social-rent family-sized housing. The policy is not effective in that it fails to address the acute need for social-rent family housing. The "pragmatic approach" advocated at 3.92 has failed to secure the homes Londoners need. There should be a strengthening of requirements to deliver affordable family sized units, particularly in light of under-delivery under the previous London Plan, which, again has not been considered and responded to.

While in some respects “London is a single housing market area” (as per para 3.95), different boroughs have different size mix needs. Contrary to the London-wide data, some boroughs need more family sized units (conventional in addition to affordable). This should be acknowledged and accounted for.

HN8 Housing Design

Response by Just Space www.justspace.org.uk

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We request to speak at the Examination.

The policy is unsound because insufficient evidence has been provided as to the effectiveness of current policies - which largely continue from before - and the draft Plan has dropped many measurables, leaving the policy ineffective.

Although much of this has carried over from the current London Plan, many of the standards have been subtly downgraded with no explanation. In fact, there is no evidence of any review of the outcomes of housing design policies in the current Plan, and no fundamental changes to the approach, despite the fact that the design-led approach to optimising site capacity was introduced to that Plan (D3) and was such a significant change.

It is also odd that there is no review, since the housebuilding LPG has trialled much of this new approach, along with the 'emergency measures'. But there is no analysis of the development proposals this have generated, nor the impact on delivery of this new policy approach. There appear to have been few new applications which have taken advantage, although many developers have stalled delivery in order to submit variations reducing the affordable housing element.

This lack of review is also unacceptable given the increasing evidence of the need for homes to be able to maintain sustainable liveability in the context of rapid climate change. For example, dual aspect was the required norm in current LP D6, where exceptions are only allowed for design reasons (Part D of Policy D3). But in this proposed London Plan (**part A 1**) single aspect is allowed "within the overarching aim of optimising site capacity" i.e. maximizing total units. This is extraordinary, given the successive heatwaves Londoners have just experienced, many unable to stay in their single-aspect homes during the daytime without extensive mechanical cooling systems. Dual aspect is essential if we are to produce the resilient housing stock this city will need as the climate changes beyond recognition. Skilful design can achieve this, as well as more family-sized homes – which we desperately need, of course. The policy should strengthen the requirement for dual aspect, not water it down.

Similarly, the minimum of one habitable room with an openable window ¹ is grotesque. All habitable rooms should have openable windows. Again, family homes should be on the lower six floors to

¹Part A(2)

provide access to playspace “where practical”² This should be the standard: families should not be higher than the sixth floor. Thankfully the 10m² playspace per child has been retained, as has the minimum amount of external space. But the minimum internal space standards for new dwellings, (set out in current LP Table 3.1) have been dropped, and even the minimum ceiling heights have been shaved by 10cm! The qualitative design aspects to be addressed in new housing development, set out at 3.2, has also largely been lost.

Loss of access to daylight and sunlight is one of the most perniciously harmful dangers when seeking to optimise development on sites. There is no lack of evidence that access to good daylight and sunlight is essential for mental and physical health. There are no absolute minimums or maximums for access to daylight and sunlight, there is only guidance and judgement based on experience.

The BRE has been leading on such issues for decades, and their ‘Site Layout for Daylight and Sunlight’ is the most widely referred to guidance on assessing daylight and sunlight for planning purposes. The BRE’s evidence is that on one measure of the daylight received at a window (Vertical Sky Component) 27% would generally provide adequate daylight coverage in an average-sized room, and that the loss of up to 20% of this light would be acceptable, taking the VSC down to 22.5%. However, many large building applications in recent years have far more damaging impact on daylight, with hundreds of social homes (who have no recourse to Rights of Light compensation) being plunged into darkness with 15% VSC being taken as acceptable, and schemes leaving neighbours with just 5% VSC (and losses of over 80%) considered acceptable. This consideration is not based on an understanding of the disastrous effects this can have on whole communities, but is the result of planning policy urging densification, developers seeking to maximize development envelopes, and decision-makers being forced into meeting housing targets.

Given that the core mantra of this entire Plan is densification, there is an acute need to protect our most basic amenity of access to daylight. But this draft London Plan has removed the existing London Plan’s weak statement that “development should provide sufficient daylight and sunlight to new and surrounding housing appropriate for its context”, with **MBUL6** the only other mention of daylight.

Similar issues arise with sunlight on external spaces around buildings. GLA Housing Design Guidance goes further than the niggardly BRE standard (50% of the open space receiving minimum 2 hrs direct sunlight daily) and requires “that spaces designed for frequent use (including sitting and play spaces) receive direct sunlight through the day, particularly at times they are most likely to be used”.³

² Part D

³ B9.5

HN9 — Accessible housing

Wheelchair-access and accessible housing provisions exist but lack stronger equalities framing and enforcement. The policy does not adequately address the needs of disabled people, older people and people with other protected characteristics; does not link accessibility to affordability and need.

This policy is unsound for the following reasons: it is not

positively prepared: does not adequately address the needs of disabled people, older people and others with protected characteristics; does not identify key needs of the area appropriately; reducing affordability targets while retaining a rhetorical strategic target is an equalities issue.

justified: no evidence the policy is the most appropriate strategy against reasonable alternatives; alternatives such as stronger equalities framing, enforcement and monitoring have not been assessed.

effective: no enforcement mechanism; no monitoring framework for accessible housing delivery; uses “should” rather than “must” where outcomes are essential.

consistent with national policy: the NPPF supports accessible housing, and the Equality Act 2010 requires reasonable adjustments; the policy is too weak to meet these duties.

Change required: Require accessible and wheelchair-accessible dwellings. Strengthen enforcement of accessibility standards. Convert “should” to “must” where outcomes are essential. Establish monitoring of accessible housing delivery and equalities outcomes.
