



The
London Forum
of Amenity & Civic Societies

London Forum response to 'Support for Housebuilding draft LPG' Jan2026

The Mayor's consultation document was [here](#).

Cycle parking

Question 1: Are the proposed changes to the cycle parking standards, in conjunction with the wider package proposed by this consultation, likely to make a material difference to the viability of residential schemes while still providing sufficient cycle parking to enable sustainable growth in London and mode shift?

We understand the rationale for reviewing the current London Plan standards set in Policy T5, and reducing those standards for boroughs in Bands 2 and 3. But we have reservations about the evidence on which the new standards are based. Cycle mode share, as shown in the London Travel Demand Survey, includes people using the increasingly popular hire bikes as well as people riding bikes they own.

We recognise that data on numbers of cycles per household has been used in setting the amounts of parking to be provided in each band. But it is perfectly possible that some boroughs in Band 1 have relatively low numbers of cycles per household compared with Band 2 boroughs and vice versa. We note also that the data does not appear to include data about frequency of cycle use.

Finally, we note that nothing is said about the current London Plan requirement for one space per 40 units for visitor parking.

Question 2: Do you consider that the guidance on flexibility and quality in sections 2.3 and 2.4 of the guidance will address development viability and cycle parking quality challenges?

We welcome the flexibility allowed to LPAs (2.2.2) where there is compelling evidence that applying Table 2.1 could mean failing to meet local demand for cycle parking, and higher provision may be appropriate. But the reference to considerations in 2.2.4 fails (there is no such paragraph; and 2.3.4 refers to reducing the figures in Table 2.1, not increasing them). We would not support provision of off-site communal parking as set out in 2.3.1 (5). Nor would we support the possible reduction in provision (2.3.4 (3)) for high-density or large-scale developments. It is precisely in such developments that adequate cycle parking is required.

Changes to housing design standards

Question 3: The GLA welcomes views on the proposed changes to the housing design standards.

We believe that the policy set in London's Housing Design Standards LPG C4.1 is entirely reasonable : that single-aspect homes should be restricted to homes with one or two bedspaces; should not face north; and must demonstrate that the units will: have adequate passive ventilation, daylight and privacy; and not overheat (particularly relevant for south or west-facing single aspect units). That guidance was introduced to lower the occurrences of damp and mould. Single aspect *may* otherwise be acceptable by exception. The draft states that London Plan Policy D6 part C will continue

to apply, but it does not state that paragraph 3.6.5 of the Plan, which makes the same restrictions as the LPG C.4.1, will be deleted from the Plan.

The current restriction to eight units per floor in each core (LPG B2.5) derives from the 2007 report “Recommendations for living at Superdensity”, which was taken up in the “Interim London Housing Design Guide” published in 2010. The Housing Supplementary Planning Guidance in 2016 stated that “How dwellings are grouped can have far-reaching implications for the social dynamics of a building; maintenance and security arrangements; and the privacy, comfort and satisfaction of residents. [...] The number of people sharing a circulation core and landing will affect whether residents have a sense of ownership over the space.”

The proposal to remove the standard makes no attempt to address, still less refute, those arguments; and we believe it would be a retrograde step. It would be far preferable to reduce the strictness of interpretation but retain the policies and the standards.

Affordable housing

Question 4: The GLA welcomes views on the time-limited planning route. Do you agree that this will support the early delivery of housing development whilst also maximising affordable housing provision in the short term? Are there any changes to the approach that would more effectively achieve these objectives?

We acknowledge the evidence that the average affordable housing level of referable applications that have been approved through the viability tested route was 20 per cent between 2022-2024, and that it almost certainly has fallen since. We are also aware of s73 applications to reduce affordable housing levels previously agreed, and also of the hundreds of consented schemes that remain to be built out. Nevertheless, we have strong concerns about such a drastic reduction in the threshold for the Fast Track Route (FTR).

There is obviously a risk that reducing the threshold from 35% to 20% for the fast track route without any need for a viability assessment will lead to an increase in s73 applications and deeds of variation to reduce the levels of affordable housing. Further delays will thus be built into what is already a highly bureaucratic and lengthy set of processes.

We are aware also of applications and consented schemes where years-long delays have been caused by developers’ failure to find a registered provider (RP) to take on housing for social rent; and RPs’ ability to take on what developers have undertaken to provide must be addressed further as a matter of urgency. There is no sign that the measures in the 2025 Spending Review to improve RPs’ financial position has had any significant impact.

One of our key concerns is that what is put forward as a temporary emergency measure will in fact become permanent; and while we welcome the Mayor’s stated commitment to the principles underpinning the FTR and to maintaining a higher threshold in the medium to long term, it may become very difficult to increase the threshold to current levels by 2028.

Eligibility

Question 5: Do you agree with the proposed eligibility criteria for the time-limited planning route? The GLA welcomes any views on whether this will, and how this better can, help to achieve the objective of increasing housing supply and supporting early delivery whilst also maximising affordable housing provision in the short term.

We strongly support excluding PBSA and co-living schemes from the scheme. They are cheaper than conventional housing to build, and have the highest viability ratings. We do not consider it reasonable to include mixed developments where PBSA and co-living elements comprise up to 50% of the GIA of the proposed scheme. This will simply encourage game-playing by developers.

Grant funding

Question 6: Do you agree that the proposed approach to grant will help to achieve the objective of increasing housing supply and supporting early delivery, whilst also maximising affordable housing provision in the short term? To what extent will this help to support the acquisition of affordable homes secured through the planning process by Register Providers?

Grant funding is likely to have some limited impact on the supply of affordable homes. But more active measures will be needed to support RPs' acquisition of affordable housing.

Reviews

Question 7: The GLA welcomes views on the approach to reviews under the time limited route, including whether any further criteria should be applied which would a) incentivise early delivery, or b) help to ensure that, if reviews are triggered, additional affordable housing contributions are provided where viability improves over the lifetime of the development.

The rules in this part of the draft LPG are inevitably complex; and the definitions - such as what constitutes the first floor and whether it 'has been built' as in paragraph 4.6.1 - will have to be carefully considered to avoid game-playing.

Question 8: Recognising that the substantial implementation milestone of the first floor set out in 4.6.1 may not be appropriate in all instances, are there any circumstances in which an alternative review milestone to completion of the first floor would be necessary and justified, in a way that continues to incentivise fast build out?

No comment

Question 9: An alternative approach for phased schemes would be for boroughs, and the Mayor for referable applications, to have discretion to agree forward dates and milestones for future phases if it would support the faster build out of the scheme, which if met mean that no review is required for that phase. Do you agree with this and what measures would be required to ensure that this resulted in faster build out than may otherwise be the case?

No comment

Maximising affordable housing including on existing schemes

Question 10: The GLA welcomes views on any additional measures that would support the delivery of schemes with existing planning consents which provide 35 per cent or more affordable housing. Do you agree that the time limited planning route would support schemes which have been granted planning consent but are currently stalled?

Given the hundreds of schemes that are currently stalled, it would be perverse not to include them in the new scheme. But the negotiations on reducing the levels of affordable housing will put considerable strain on LPAs, will not be speedy, and will reduce boroughs' reasonable expectations as to the amounts of affordable housing that will be delivered in their areas.

Question 11: Are there any further measures that would help to prevent the level of affordable housing being reduced in consented schemes where this is not needed to enable the development to progress?

Given the nature of the overall proposals, it is difficult to see what might be done to avoid the balance in negotiations between boroughs and developers being weighted heavily in favour of the latter.

Submitted by

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