

MAYOR OF LONDON

Integrated Impact Assessment
Screening for
London Plan Guidance

**Support for
housebuilding**

November 2025

Integrated Impact Assessment Screening for Support for housebuilding draft London Plan Guidance

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1. Background

Legislative and policy context

- 1.1 The Supporting housebuilding London Plan Guidance (SHLPG) is made under the Mayor's powers within s.30, 32, 34 and 334 of the Greater London Authority Act 1999. This document considers the application of the Environmental Assessment of Plans and Programmes Regulations (2004) to carry out a Strategic Environmental Assessment (SEA) which is designed to specifically identify environmental impacts.
- 1.2 This document also considers the Mayor's legal duties to consider the impact of the SHLPG on health, health inequalities and community safety. A separate Equalities Impact Assessment (EqIA) has been prepared to accompany this document focussing upon the Mayor's legal duties in relation to equalities under the Equality Act 2010 and other legislation.

London Plan 2021 Integrated Impact Assessment

- 1.3 The 2021 London Plan was subject to an Integrated Impact Assessment (IIA) at multiple stages throughout the course of its preparation which assessed the likely effects of the Plan's Good Growth objectives and policies on a number of environmental, social and economic objectives. This was to ensure the promotion of positive impacts and to, ideally, mitigate any potential negative impacts of policies.
- 1.4 The IIA documents consisted of the following four components of assessment:
 - Equalities Impact Assessment (EqIA)
 - Strategic Environmental Assessment (SEA)
 - Health Impact Assessment (HIA)
 - Community Safety Impact Assessment (CSIA)
- 1.5 Each assessment contained 24 objectives and were guided by a set of questions. Policies were scored in terms of the significance of the potential effects as set out in the table below.

Symbol	Significance of effect
++	Significant positive
+	Minor positive
O	Neutral
-	Minor negative
--	Significant negative
?	Unknown - insufficient information to make a robust assessment.
N/A	Not applicable - objective is clearly not affected by the policy being assessed.

1.6 In total the London Plan was subject to 4 stages of IIA assessment (excluding scoping): one stage on the draft London Plan published for consultation in December 2017; a further two stages on minor suggested changes arising from consultation and the subsequent Examination in Public; and a final assessment on changes made as a result of the Secretary of State's (SoS) issued Directions in March 2020.

1.7 IIA documents can be found on [the GLA's website](#).

1.8 The Mayor has taken account of the IIA undertaken in respect of the 2021 London Plan in considering whether further assessments are not necessary to comply with his legal duties.

2. Support for Housebuilding LPG

- 2.1 Housebuilding in the capital has faced significant challenges over recent years – including the impact of the Covid-19 pandemic, high interest rates, spiralling construction costs, regulatory blockers and wider economic conditions.
- 2.2 In October 2025, in response to these challenges, the Mayor of London and Government announced a series of emergency measures designed to kick-start housebuilding across the capital.
- 2.3 These measures are subsequently set out in the Mayor's draft Support for housebuilding London Plan Guidance (SHLPG), which is accompanied by this IIA screening.
- 2.4 A summary of the draft SHLPG proposals (headed with an ID code) is set out below:

Cycle parking Standards

SH1

- 2.5 Time-limited reduction in the minimum long-stay cycle parking requirements for dwellings, purpose-built student accommodation and large-scale purpose-built shared living set out in Table 10.2 of the London Plan 2021 until 31 March 2028 or publication of a revised London Plan, as follows:
 - setting different requirements in different areas of London, with boroughs grouped into three bands, rather than one London-wide requirement
 - removing separate requirements for studio or one-person, one-bedroom dwellings and two-person, one-bedroom dwellings
 - introducing a requirement for three-or-more-bedroom dwellings separate to that for two-bedroom dwellings
 - reducing the requirements from London Plan policy, as per Table 1: Minimum Long-stay Cycle Parking (below)
 - introducing guidance on flexibility in meeting the long-stay cycle parking requirements, including what types and locations of cycle parking would be acceptable.

SH2

2.6 Time-limited removal of the recommended benchmark for cycle storage of 0.75 per person set out in Table 3.2 of the Large-scale purpose-built shared living LPG to be replaced by the relevant standards detailed in SH1, until 31 March 2028 or the publication of a revised London Plan.

Table 1: Minimum Long-stay Cycle Parking

Use	Current	Proposed band 1	Proposed band 2	Proposed band 3
Dwelling: Studio or one person, one bedroom	1	1	0.9	0.7
Dwelling: Two person, one bedroom	1.5	1	0.9	0.7
Dwelling: Two bedroom	2	1.5	1.3	1.2
Dwelling: Three or more bedroom	2	1.9	1.6	1.5
Large-scale purpose-built shared living room	1	0.7	0.6	0.5
Purpose-built student accommodation bedroom	0.75	0.7	0.6	0.5

Changes to the Housing Design Standards LPG

SH3

2.7 Revocation of the following standards set out in the Housing Design Standards LPG:

- C4.1 requiring new homes to be dual aspect unless exceptional circumstances make it impractical or undesirable
- B2.5 requiring the maximum number of homes accessed by a core to be no more than eight per floor
- B3.1 repeating cycle parking requirements of the London Plan which are altered by SH1 above.

Time Limited Planning route

SH4

2.8 New time-limited planning route for the delivery of affordable housing until 31 March 2028 or the publication of a revised London Plan:

- enabling planning applications on private land, industrial land (where re-providing industrial floorspace capacity) and on utilities sites with evidence of substantial decontamination, to proceed through the planning system without an upfront viability assessment when providing 20 per cent affordable housing, reduced from the London Plan position of 35 per cent
- allowing schemes on public land and industrial not re-providing industrial floorspace capacity to access the time-limited planning route at 35 per cent
- requiring a tenure split of 60 per cent social rent to 40 per cent intermediate homes
- requiring a review of scheme viability if the first floor of building is not built by 31 March 2030 to determine if additional affordable housing contributions can be provided. For phased schemes, reviews will be required where the first floor of buildings, which together provide at least 200 residential units, have been built. The GLA is also consulting on whether there are circumstances in which an alternative review milestone may be necessary and justified in a way that continues to incentivise fast build out; and whether there should be 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
- allowing residential schemes meeting the threshold to access grant funding on all units above the first 10 per cent
- proposals in the Green/Grey Belt, for purpose-built student accommodation (PBSA) or large-scale purpose-built shared living (LSPBSL) or demolition of existing affordable housing are excluded. For mixed tenure schemes the residential component may benefit from the new thresholds where the PBSA and LSPBSL floorspace (combined) comprises less than 50 per cent of residential GIA, and where the relevant London Plan PBSA threshold and LSPBSL requirements are met.

3. IIA Screening

- 3.1 Increasing housing delivery in London is a key priority for the Mayor, as set out in London Plan Good Growth Objective 4 and policy H1. As part of this, the provision of affordable housing (as sought by policy H4) is particularly important for addressing housing need and diversifying and increasing overall supply.
- 3.2 The SHLPG and the accompanying background information document acknowledge the significant challenges that have slowed delivery across the capital and the current evidence suggests that housing targets may not be met in long term. Underdelivering against plan targets would result in negative impacts which will be felt in particular by those in need of affordable housing and who often have protected characteristics under the Equality Act 2010. The SHLPG proposals SH1 – SH4 seek to introduce a set of measures designed to respond to these challenges and urgently support housebuilding in the short term, assisting delivery to ‘get back on track’.
- 3.3 The London Plan IIA has already assessed policies attempting to increase the supply of homes (including affordable homes) in the context of acute need, finding overall positive impacts. The objective of the SHLPG is to provide an urgent intervention to reinvigorate the core objective of increasing the supply of homes (including affordable housing) and reduce a downward trend. Boosting delivery is considered unlikely to result in any negative impacts on sustainability, health or community safety, instead it will maintain the positive impacts demonstrated through the London Plan IIA.
- 3.4 In terms of SH1, in addition to supporting the aim of increasing supply, it is recognised that a reduction in potentially unused residential cycle parking – while easing the viability context through increased net saleable areas and reduced build costs – may have sustainability impacts on cycle ownership and mode share targets, traffic reduction and air quality. In turn this may lead to health effects. Reduced cycle ownership may potentially result in some reduction in cycling trips and reduce progress towards the Mayor’s Transport Strategy target for all Londoners to do at least 20 minutes of active travel a day to stay healthy. Fewer cycling trips may also result in additional car journeys, which could in turn lead to an increase in road danger.
- 3.5 People with protected characteristics including disabled people, young people, Black people, men as well as those on low incomes are disproportionately affected by road collisions compared with other people. Increased air pollution may also result, and this particularly affects children and people aged 65 and over. It is noted however that any reduction in cycle ownership would be partially offset by the expansion of cycle and scooter hire schemes now in place across London.

3.6 The potential impacts should also be considered in the context of one of the underlying objectives of the transport policies in the London Plan: achieving the Mayor's Transport Strategy target for 80 per cent of trips in London to be made on foot, by cycle or using public transport by 2041. Progress towards this target will depend upon a range of factors. For cycling, these include improved cycling infrastructure, parking provision in new residential developments, parking provision in other developments and the availability of on-street parking.

3.7 Mode share growth in cycling has been strong in recent years, increasing from 3.7 per cent in 2018 to 4.5 per cent in 2023. In the context of an increasing population and the total number of trips made in London, this is significant. However, the proposed standard set out in SH1, is expected to generally accommodate existing demand along with some capacity for future growth. Moreover, by ensuring the measure is time-limited, the sustainability and health impacts are expected to remain limited in the medium and long term. No impacts are identified in terms of community safety. SH1 continues to provide support for the overarching transport policy objectives of the London Plan and given this is a time limited approach it is not considered to give rise to adverse impacts that would outweigh the benefits arising from increased housing delivery.

3.8 Proposals SH2 and SH3 withdraw or alter areas of adopted LPG, providing a replacement implementation tool for existing London Plan policy. These measures have no material impact on policy itself. London Plan policy, which has already been fully assessed through the London Plan IIA and found to be acceptable, is not altered.

3.9 SH4 is a departure from Policy H4 Part A, Policy H5 and Policy H6 of the London Plan and has been introduced as an emergency measure to help address the current significant downturn in housing delivery in London. There have been significant changes to market conditions, and some recent applications have been granted with very low levels of affordable housing, including at appeal, which may not effectively meet housing need.

3.10 The aim of SH4 is to incentivise applicants to follow the time limited planning route, by setting lower thresholds than those in London Plan policy H5, but with the intention that more affordable housing is provided than through the Viability Tested Route. The intervention also attempts to tackle slow build out rates, which are often associated with a lack of diversification in schemes and higher levels of market housing. The time-limited nature of this proposal in exceptional economic circumstances is designed to encourage schemes to come forward, and existing schemes to progress, in the near-term, in order to support a rapid recovery in housing delivery, while providing a higher level of affordable housing and more timely build out than may otherwise have been the case. Increase housing supply, in particular affordable housing has

positive impacts on health and well-being and no community safety effects are considered to arise.

3.11 It should be noted however that an EqIA of potential impacts has been carried out to ensure proposals are not disproportionately felt by Londoners with protected characteristics as part of ensuring best practice and meeting the Public Sector Equality Duty.

4. Conclusion

4.1 The SHLPG – in its attempt to urgently increase the supply of homes in the short-term, reversing downward supply trends - is considered unlikely to introduce significant negative economic, social, environmental or health effects, or to negatively impact community safety. The London Plan 2021 IIA's conclusion of overall positive effects arising from the increased supply of homes (including affordable homes) in the context of acute need is therefore not materially altered by what is proposed within the SHLPG. Instead, the SHLPG is considered to maintain the positive impacts demonstrated through the London Plan IIA.