

# GREATER LONDON AUTHORITY

## REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2807

**Title: Commission of evidence for specialist and supported housing need for the London Plan**

**Programme: London Plan (Building More Homes)**

### **Executive Summary:**

The London Plan team seek approval to procure evidence to underpin the new London Plan relating to specialist and supported housing to provide updated assumptions and estimates on the supply of and unmet demand for such housing in 2024-25. This is a single source procurement from the Centre for Regional Economic and Social Research at Sheffield Hallam University who already hold the data.

### **Decision:**

That the Assistant Director of Planning and Regeneration approves:

1. single source procurement of evidence on specialist and supported accommodation by the Centre for Regional Economic and Social Research at Sheffield Hallam University, to support the new London Plan's development
2. an exemption to standard procurement processes on the grounds of complete absence of competition and continuation of existing work
3. expenditure of up to £25,000.

### **AUTHORISING ASSISTANT DIRECTOR/HEAD OF UNIT**

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

**Name:** Lucinda Turner

**Position:** Assistant Director for Planning and Regeneration

**Signature:**



**Date:** 19 January 2026

## **PART I - NON-CONFIDENTIAL FACTS AND ADVICE**

### **Decision required – supporting report**

#### **1. Introduction and background**

- 1.1. Approval is sought to spend up to £25,000 to appoint the Centre for Regional Economic and Social Research at Sheffield Hallam University to produce evidence for the London Plan (LP) on specialist and supported housing (SSH) and older persons housing. This supports the Mayor's programmes of Building More Homes and Making the Best Use of Land, by assessing the needs and supply of SSH and providing clarity over the approach that a strategic policy might take.
- 1.2. The current LP contains policy H12 which encourages boroughs to support the delivery and retention of SSH and to establish the levels of short-term, medium-term and permanent SSH need within their area via local needs assessments. It provides a list of what might be considered to be SSH but does not contain any directives for boroughs in terms of delivery expectations or how to best plan for SSH alongside conventional and other specialist housing, in the context of a constrained land supply.
- 1.3. The LP also contains policy H13, on specialist older persons housing. It requires boroughs to work positively and collaboratively to identify sites for older persons housing in line with need and sets out requirements for such housing in terms of design and accessibility, but again does not provide a strategic direction from the regional perspective in terms of delivery expectations.
- 1.4. The National Planning Policy Framework (NPPF) 2024 and draft NPPF 2025 requires development plans at the appropriate level to take into account an assessment of the size, type and tenure of housing for older persons and specialist accommodation. The draft NPPF also requires the identification of sites and/or the setting of requirements for parts of allocated sites which can provide for this type of housing where there is identified need.
- 1.5. The current LP leaves it in the hands of the boroughs to guide the framework for SSH and older persons housing locally. This, however, is not resulting in the delivery of SSH that London needs and there remains questions over whether we are planning sufficiently for an ageing and changing population. Examples were provided through the Planning for London consultation period (2023) whereby much needed SSH was not granted permission due to it potentially being used to service the needs of residents outside of the borough, meaning that it could not be supported by social services due to the liability of outside borough fees. Moreover, this makes it difficult for boroughs to allocate sites to reduce land values for the benefit of bringing provision forward. A strategic framework that could ensure SSH is positively planned for across London would make a significant difference to ensuring SSH has a greater footing to compete with general needs housing.
- 1.6. The Towards a New London Plan consultation document (2025) proposed that a new LP could take a more strategic approach to meeting SSH and older persons housing needs, to ensure the right housing mix overall across London is planned for, helping to rebalance the playing field with general needs housing.
- 1.7. There is currently no London-wide evidence that would be suitable to provide a picture of the supply or projected future need for SSH or older persons housing. Boroughs have some evidence geared towards specific groups, but information is not uniform in terms of groups covered, timescales of need, nor is it available in all locations. Evidence was not commissioned prior to now as a study of this scale would take a number of years to complete (time which is not available) and would be too costly for the relevant budget. Moreover, the Supported Housing Regulatory Oversight Act (SHROA 2024), will require all London boroughs (likely by 2027) to produce a SSH strategy, underpinned by an assessment of supply and demand over the next 5-10 years, and therefore it was not considered a good use of public funds to commission a full-scale assessment which would quickly be replaced by local standardised evidence. Although the requirements of the SHROA will ensure London-wide

evidence is kept up to date moving forward, the timeline for boroughs to meet the Act's requirements means that evidence will not be available in time to provide evidence to inform the new LP.

- 1.8. In 2023 the Government published the Supported Housing Review (SHR), which provides an up-to-date understanding of the UK's SSH sector and is a unique report in terms of data, insights and scope. This was produced by Centre for Regional Economic and Social Research at Sheffield Hallam University and provides a national evidence base on housing designed or designated to come with care, support or supervision to help those the vulnerable, socially disadvantaged or disabled to live as independently as possible.
- 1.9. The final SHR is in the public domain but the substantial data underpinning the review is not. It was initially considered that SHR data could be extrapolated to determine London's needs in-house, hence it was not previously considered necessary to procure further evidence. However, further investigations with various GLA teams has recently concluded that this could not be done in a way that would produce robust and reliable data for a policy baseline and instead, access would be needed directly to the data held by Sheffield Hallam.
- 1.10. The Centre for Regional Economic and Social Research at Sheffield Hallam University have confirmed it could be commissioned to produce a London-wide report with relative ease and haste. As the data already exists in the desired format, the contract should be exempted from normal procurement processes on the grounds of a complete absence of competition. While it might be argued that a London-wide commission could be procured to reproduce this data, this would not meet business needs. The Mayor's next London Plan is due to be published for consultation in Spring 2026 and draft policies will need to be completed within the next few months. As such, there is not time for a wholly new approach to this data to be taken by a supplier and nor is there need, given the university's publicly accessible SHR which clearly encompasses the London-level data required, albeit currently in an aggregated and inaccessible format. Moreover, this would be cost effective compared to tendering for a new London-wide commission which would likely mirror the costs of the London wide needs Gypsy and Traveller Needs Assessment (another piece of specialist housing evidence that was recently completed) at approximately £150,000. Overall, it is highly unlikely that any other provider could successfully bid for this contract in light of Sheffield Hallam's clear advantage in owning the required data already and its ability to reproduce it for London quickly and cost-effectively.

## **2. Objectives and expected outcomes**

- 2.1. Commissioning a SSH report for London would provide updated assumptions and estimates on the supply of and unmet demand for SSH for 2024-25, confirming the sector's complexity in terms of client and provider types, delivery models, commissioning practices, funding mechanisms, and development constraints. These factors interact to different extents in different locations leading to uneven provision across local authorities, and this approach would allow for pan-London conclusions to be drawn.
- 2.2. The study would be split into three components described below:
  - Component 1: update assumptions and estimates on the supply of supported housing in London for 2024-25 (from baseline 2022-23). Levels of un-met need would also be generated. The calculations would provide supported housing stock estimates for London as a whole and but also additionally consider distribution of stock across London Boroughs. Estimates would also be provided by broad service types. The methods would be tested to see if reliable data can be generated for larger individual client groups (see below). Projections through to 2040 would be produced to consider future growth required to sustain current rates of provision, unmet demand, population projections, and prevalence of need.
  - Component 2: Newly available MHCLG CORE data (Continuous Recording of Lettings and Sales in Social Housing in England) would be downloaded and analysed. CORE is a valuable source of administrative data on all new supported housing tenancies collected by Private Registered

Providers and Local Authorities. The 2024-25 data was recently released on 13 November 2025 and is available for each London Borough. The data would help to provide an understanding of the distribution of new lettings by client group type and tenant characteristics for each London Borough. This component would test whether the assumptions that underpin the findings for England remain valid for London as a whole.

- Component 3: Department for Work and Pensions (DWP) Single Housing Benefit Extract (SHBE) data would be analysed for London. SHBE provides valuable insights on the distribution of benefit claimants eligible for Housing Benefit under Specified Accommodation rules. These claims can be sub-divided into those meeting Exempt Accommodation regulations and other Specified Accommodation groups, and by working age and pension age claimants. This component would test that the assumptions that underpin the findings for England remain valid for London as a whole.

2.3. On completion this would provide detail against the parameters set out in the draft table below:

	Number of homes	Commissioned homes	Unmet need	Number of voids	Awaiting move on to general needs home (where applicable)	Additional homes needed in the next 5 years	Additional homes needed in the next 10 years (cumulative)
<b>Transitional supported housing</b> For people in crisis or with temporary support needs. Typical duration of support up to 2 years.							
<b>Long-term supported housing</b> For people with enduring or lifelong support or care needs.							
<b>Older People's supported housing</b> For people aged 55+ with support of care needs.							

2.4. In terms of older persons housing, it should be noted that officers do not anticipate that the research will capture the full picture of need as its focus is around providers that are registered. As such, it will not capture all demand and provision for over 55's market housing (for example 'retirement villages'), however, the forthcoming Strategic Housing Market Assessment (SHMA 2026) will provide a

projected tenure need breakdown for older persons households (65+) over the coming decade, helping to close any evidence 'gap'.

- 2.5. First and foremost, the evidence commissioned would support the London Plan team to bring forward strategic policy in a new London Plan to satisfy requirements of the NPPF and deliver more SSH and older persons in line with needs.
- 2.6. This evidence commissioned would also support the work of GLA Housing & Land and the Building More Homes and Accommodation and Wider Support delivery plans. Through the London Social and Affordable Homes Programme 2026-36 (SAHP), the GLA can provide grant funding for investment partners seeking to deliver SSH. In the previous 2021-26 AHP, the GLA took a market-led approach; while prospective bids have included information on how the scheme would meet local demand for SSH, the GLA has not sought to prescribe the proportion of funding which should be allocated to each client group to reflect pan-London need.
- 2.7. Projections for SSH would enable GLA officers to identify the need for supported housing by client group over the LSAHP 2026-36 period, which could inform policy thinking on how best to meet need.
- 2.8. The commission would also support the delivery of the Ending Homelessness Accelerator Programme which has been jointly developed by the Mayor and London Councils to support partners to work together and improve services for those at risk of homelessness. A key goal of the Programme is to increase availability of SSH and to ensure better join up in its delivery. Insights regarding the scale and composition of the sector and the variation in commissioning practices will support the Programme to identify strategic commissioning objectives and prevent the loss of existing stock.
- 2.9. Research would mirror the requirements of the SHROA 2024 to support greater alignment between authorities and the delivery of SSH and provide the GLA with the ability to sense-check borough needs assessments and account for any unmet, pan-London need.

### **3. Equality comments**

- 3.1. The Public Sector Equality Duty (PSED) set out at Section 149 of the Equality Act 2010 requires the GLA, when exercising its functions, to have 'due regard' to the need to:
  - eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act
  - advance equality of opportunity between people who share a protected characteristic and those who do not
  - foster good relations between people who share a protected characteristic and those who do not.
- 3.2. The three aims of the duty must be fulfilled on a continuing basis by the GLA when exercising its functions. In addition, public bodies must take steps to take account of a person's disability and make reasonable adjustments to remove barriers for disabled people. This duty is 'anticipatory'.
- 3.3. As a piece of technical evidence, the project is unlikely to have any significant direct impact on persons with protected characteristics, however it may result in a policy in the new London Plan which aims to increase SSH and older persons housing, which would have anticipated positive impacts on those with protected characteristics, notably in relation to age and disability. Any policy resulting from this evidence base would be subject to a full Integrated Impact Assessment (IIA) as part of the draft London Plan.

#### 4. Other considerations

##### Key risks and issues

4.1. The timescales to procure and complete this evidence in time to align with the programme for publishing a draft London Plan in May 2026 are extremely tight. This spend is being pursued as an urgent single source procurement and the urgency has been raised with TfL. However, any issue with the eight-week preparation period suggested by Sheffield Hallam, or delay with procurement, may mean risk of missing the London Plan publication timescale. If this were to occur there would be no underlying evidence base for SSH and older persons policy of the next London Plan. To alleviate this risk, initial mitigation includes securing a clear and detailed plan of works from the consultant team. Ongoing project management by the GLA will also help to ensure that this programme is adhered to during the course of the work.

4.2. There are no actual or perceived conflicts of interest associated with this procurement.

##### Links to Mayoral strategies and priorities

4.3. This project primarily supports the Mayor's programmes of Building More Homes and Making the Best Use of Land, by assessing the needs and supply of SSH and providing clarity over the approach that a strategic policy might take.

#### 5. Financial comments

5.1. Approval is sought for the expenditure of up to £25,000 to fund a new piece of evidence on SHH to unpin the next London Plan. The cost of this licence will be funded from the London Plan programme budget, held within the Planning & Regeneration unit as approved as part of the 2025-26 GLA budget setting process.

5.2. Single source procurement exemption is applicable here due to the complete absence of competition; given that the Centre for Regional Economic and Social Research at Sheffield Hallam University already holds this data in the required format. While consideration has been made to using a London-wide commission to produce this data, this option would not meet the required timeframe and would likely to be less cost effective.

5.3. All appropriate budget adjustments will be made.

#### 6. Legal comments

6.1. The Mayor's statutory plan-making powers are set out in Part VIII of the Greater London Authority Act 1999 ("the Act"). Section 334 of the Act requires the Mayor to prepare and publish the London and sections 339 and 340 of the Act require the Mayor to keep the London Plan under review.

6.2. Section 30 of the Act gives the Mayor the power to do anything he considers will further or which are facilitative of, conducive or incidental to the promotion of economic development and wealth creation, social development or the promotion of the improvement of the environment in Greater London; and in formulating the proposals in respect of which a decision is sought officers have complied with the Authority's related statutory duties to:

- pay due regard to the principle that there should be equality of opportunity for all people
- consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the United Kingdom
- consult with appropriate bodies.

- 6.3. Section 34 of the Act contains a general power to do that which is calculated to facilitate, or is conducive or incidental to, the exercise of any functions of the Authority. The decision requested of the Assistant Director to procure this specialist evidence designed to ensure that the London Plan housing policies are effective may reasonably be regarded as facilitating, being conducive or incidental to the exercise of the Mayor's powers detailed above.
- 6.4. The Mayor and the Authority are subject to the public sector equality duty; this is considered in detail in section 3 above.
- 6.5. Section 9.1 of the Authority's Contracts and Funding Code (the 'Code') requires the Authority to call-off services with a value of that concerned here from a suitable framework, where possible, or if not, to undertake a competitive process which managed by TfL Commercial in respect of the services required. However, the Assistant Director may approve an exemption from this requirement under section 10 of the Code upon certain specified grounds. One of those grounds is that a contract may let without competition where there is a complete absence of competition for the services required. Officers have indicated that this ground applies and that the proposed contract affords value for money. On this basis the Assistant Director may approve the proposed exemption if satisfied with the content of this report.
- 6.6. In the event that the Assistant Director makes the decisions sought officers must ensure that a contract is entered into and executed by the Authority and the Centre for Regional Economic and Social Research at Sheffield Hallam University before the commencement of the services.

## **7. Planned delivery approach and next steps**

- 7.1. The project will be completed and delivered as follows:

<b>Activity</b>	<b>Timeline</b>
Procurement of contract	January 2026
Delivery Start Date	January 2026
Delivery End Date	February 2026

## **Appendices and supporting papers:**

None.

## Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

## Strategic Programmes

**Does this decision seek approval for activity falling within the remit of a programme delivery plan? YES/NO**

If YES, which programme/s does this fall within:

Building More Homes

Making the Best Use of Land

## Part 1 - Deferral

**Is the publication of Part 1 of this approval to be deferred? NO**

Until what date: NA

## Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

**Is there a part 2 form – NO**

## ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

### Drafting officer:

Mikyla Smith has drafted this report in accordance with GLA procedures and confirms the following:

✓

### Mayoral Delivery Board

A summary of this decision was reviewed by the Mayoral Delivery Board on 19 January 2026.

## ASSISTANT DIRECTOR, FINANCIAL SERVICES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

**Date:** 30 January 2026

**Signature:**

