

GREATER LONDON AUTHORITY

REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2801

Title: London Plan Annual Monitoring Report 21 2023-24

Programme: Making Best Use of Land

Executive summary:

The London Plan was formally published in March 2021, making it part of the statutory development plan for Greater London. Section 346 of the Greater London Authority Act 1999 requires the Mayor to monitor the implementation of the London Plan. Mayoral Decision 2978 approved the framework for undertaking Annual Monitoring Reports (AMRs), including delegating authority to approve AMRs to the Assistant Director for Planning and Regeneration.

This Assistant Director Decision seeks approval of the AMR21, which covers the monitoring period 2023-24, and also includes an increase in the Intermediate Rent maximum household income threshold.

Decision:

That the Assistant Director of Planning and Regeneration approves:

- an increase in the Intermediate Rent maximum household income threshold from £67,000 to £75,000
- the publication of the Annual Monitoring Report 21 (2023-24).

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 Planning and Regeneration

Signature:



Date:

12 February 2026

PART I – NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. The London Plan Annual Monitoring Report (AMR) is a legal requirement and should ideally be published in spring following the end of the monitoring period. The framework for monitoring the London Plan (published in March 2021) was approved by Mayoral Decision (MD) [2978](#) in June 2022.
- 1.2. Chapter 12 of the London Plan sets out 12 key performance indicators (KPIs) for monitoring the Plan. It also notes that more detailed data and performance measures will sit alongside the KPIs in the AMR. The chapter also covers monitoring of referable applications and Opportunity Areas. All of these elements have been incorporated into the approved reporting framework.
- 1.3. The AMR21 is the third AMR to use this framework, which monitors delivery against the six Good Growth objectives set out in the London Plan.
- 1.4. The AMR is also the mechanism by which the intermediate housing income thresholds, and how they are applied, is reviewed and updated where necessary, as set out in London Plan paragraph 4.6.8. AMR21 includes an update to the household income threshold for intermediate rented housing.

2. Objectives and expected outcomes

- 2.1. The AMR is how the Mayor discharges his statutory duty to monitor the implementation of the London Plan through the publication of annual datasets and narrative analysis. Over time, these reports will support:
 - understanding of the London Plan implementation
 - the statutory London Plan review process
 - future alteration or replacement of the London Plan.

3. Equality comments

- 3.1. The Mayor and the GLA are subject to the Duty, as set out in section 149 of the Equality Act 2010 covering race, disability, sex, age, sexual orientation, religion or belief, pregnancy and maternity, gender reassignment, and marital or civil partnership status. These are the grounds upon which discrimination is unlawful, and are referred to as ‘protected characteristics’. The Duty requires the Mayor, when exercising his functions, to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act; and to advance equality of opportunity, and foster good relations, between persons who share a relevant protected characteristic and persons who do not.
- 3.2. AMR21 indicates a slight worsening of income inequality within London, relative to previous measurements. Additionally, the report highlights a fall in housing completions over the monitoring period, which has impacts with regard to equitable access to housing within London. These duties also apply to the decision whether – as part of the AMR’s publication – to update and publish the increase in the Intermediate Rent maximum household income threshold from £67,000 to £75,000.

- 3.3. The proposal is in line with the London Plan, which states that the threshold will be reviewed and updated by the AMR. This threshold was last amended in 2024 from £60,000 to £67,000 and a commitment was made in the Accelerating Housing Delivery Practice Note later in the year to review the threshold further in 2025 as part of the AMR process.
- 3.4. The decision to raise the Intermediate Rent maximum income threshold to £75,000 seeks to ensure appropriate access to intermediate rent products and also aims to support viability of delivery. The Housing Below Average Income (HBAI) data for the 2023/24 period, shows that the annual gross income of the 65th percentile of London households is £75,193. The proposed increase in income threshold (which determines household eligibility) will mean more households, including key workers and those with protected characteristics, can access intermediate rent. While this will mean that maximum housing costs rise overall for intermediate homes, the need to provide for a range of household incomes below the threshold remains a key part of London Plan policy. Moreover, through increased scheme viability, it should aid the delivery of more affordable homes in general for Londoners.
- 3.5. The Equalities Impact Assessment (EqIA) does identify some negative impacts relating to an increase in maximum housing costs for homes that are secured at the maximum household income threshold, however, this is considered to be offset by the increased number of 'middle' income households that will benefit from access to key worker (intermediate) homes, as well as the potential increase in affordable housing overall that could arise from improved development viability, which will also benefit lower income households. Together this should also help to alleviate pressure on the private rented sector.
- 3.6. It should be noted that the London Plan states that boroughs should seek to ensure that intermediate provision provides for households with a range of incomes *below* the upper limit. It also states that the Mayor's preferred intermediate rent tenure is London Living Rent (LLR). Most LLR benchmarks are below the maximum housing costs applicable under the £75,000 threshold. Maximum housing costs are also subject to other affordability requirements: they should be no more than 40 per cent of the net maximum household income, and no more than 80 per cent of market rent.
- 3.7. The London Plan policies were subject to an extensive EqIA process. Overall, it is considered that increasing the Intermediate Rent maximum income threshold from £67,000 to £75,000 is consistent with, and supports, the Mayor's duty to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not.

4. Other considerations

Key risks and issues

- 4.1. The AMR should ideally be published in spring following the end of the monitoring period. AMR21 follows on from the delayed publication of AMR20 in October 2025. This has been as a result of a number of factors, including resourcing pressures, the timing of data availability, and the need to ensure validation of datasets before publication, as set out in ADD2782. AMR21 is therefore also being published after its target release date. However, significant progress has been made between October and December to accelerate production and bring the reporting programme back on track and we expect AMR22 (2024–25) to return to the intended timetable, with publication targeted for spring 2026.
- 4.2. The AMR draws on live datasets, and therefore future downloads may result in slightly different figures. Dates related to the most recent update of the respective data have been included alongside its source to provide transparency on the underlying data. Any substantial revisions of the data from the previous report have been explicitly highlighted with an explanatory note.

- 4.3. The AMR21 highlights several areas where the London Plan has not met KPIs. These are housing approvals and completions, supply of affordable homes, transport mode share, installation of cycle parking, and cultural floorspace.
- 4.4. An increase in the supply of affordable workspace (KPI 4) has been observed during this current monitoring period, relative to the previous two. This is the third monitoring period in which this metric has been measured. KPI 10 and KPI 11 are also in their third year of active monitoring. For KPI 10, the number of referable applications meeting air quality neutral (AQN) standards is unchanged from the previous monitoring period, whilst for KPI 11, a continued decrease in the number of approved referable applications with identified harm to heritage is observed.
- 4.5. As highlighted above, a risk of the proposal is that housing costs for intermediate rent housing could become less affordable. However, there are relevant mitigating factors, including: London household median incomes have increased since the threshold was last changed; LLR benchmarks are typically below the maximum housing costs applicable under the £75,000 threshold; and other measures will be applied, limiting the extent to which housing costs increase. The intermediate thresholds will also be kept under review as a part of future AMRs.

Links to Mayoral strategies and priorities

- 4.6. The AMR is the framework for monitoring the London Plan (2021). The AMR is also the mechanism by which the intermediate affordable housing household income thresholds are reviewed and updated where necessary, as set out in London Plan paragraph 4.6.8. As set out above, the proposal to increase the intermediate rent income threshold will increase eligibility to intermediate rent for middle-income households and should support delivery of affordable housing, in line with London Plan policies H4 and H5 and wider Mayoral objectives to deliver more homes.
- 4.7. The AMR provides evidence supporting the Mayor's Making Best Use of Land delivery plan, as set out in MD3434. AMR21 supplies monitoring of London Plan performance, housing delivery, development capacity, and spatial trends. This technical evidence helps to interpret the headline indicators on housing affordability, economic growth and inequality, and neighbourhood quality, and provides information to help understand why outcomes are moving in particular directions and to inform future policy.

Consultations and impact assessments

- 4.8. There is no formal consultation process associated with the AMR, although there is provision for stakeholders to send in comments, concerns or other feedback within six weeks of publication, so that this feedback can be considered.
- 4.9. It should also be noted that the sector and boroughs were afforded the opportunity to comment informally on the intermediate rent household income threshold rise, through contact with Business LDN and London Councils, prior to the AMR's publication. As at the date of writing, no comments have been received.

Conflicts of interest

- 4.10. No conflicts of interest have been identified for any officers involved in the development of this proposal or drafting or clearance of this decision form.

5. Financial comments

- 5.1. There are no identified financial implications for the GLA from this decision.

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 Plan. Section 346 of the Act requires the Mayor to monitor the implementation of the London Plan. Further to MD297 (which authorised the AMR Framework to ensure the London Plan is monitored using principles clearly set out in this framework, in accordance with Chapter 12 of the London Plan and the Sustainability Statement published alongside it), this ADD seeks authority to publish the AMR for 2023-24.
- 6.2. The proposal in this ADD includes a change to the household income threshold for intermediate rented housing. The London Plan 2021 (paragraph 4.6.8) states that the AMR will be the mechanism to review and update these figures where necessary. 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 to change these thresholds may reasonably be regarded as facilitating, or being conducive or incidental to, the exercise of the Mayor's power under sections 334 and 346 of the Act.
- 6.3. An EqIA has also been prepared. In taking the decision requested, the Assistant Director must have due regard to the Duty, as set out within section 3 of this ADD.

7. Planned delivery approach and next steps

- 7.1. The AMR21 (2023-24) will be published once it has been approved.
- 7.2. The new Intermediate Rent maximum household income threshold will apply from the date of publication.
- 7.3. Revised rent benchmarks for London Living Rent (LLR) for the 2026-27 period that are in line with AMR21 are also due to be published by the GLA. It is understood there may be a small number of tenants holding tenancies that expire in April 2026, who may be issued new tenancies with rents at benchmarks for the 2026-27 period (existing new tenancies granted new tenancies prior to April 2026 will be charged rents based on the 2025-26 benchmarks). The rents for those tenants in some wards and some sizes of home will reflect the increase in the income threshold and the AMR requests that providers give tenants notice of any such increases as soon as possible.
- 7.4. For those with tenancies expiring from May 2026, this will not occur as the Renters' Rights Act (2025) will dissolve Assured Shorthold Tenancies (ASTs), making existing tenants' tenancies indefinite. This means existing tenants will not need to be issued new tenancies at the end of a fixed term. Unless or until the home is re-let, rents will increase annually in line with CPI.

Appendices and supporting papers:

- Annual Monitoring Report 21 2023-24
- Equalities Impact Assessment for the review of the Intermediate Rent maximum income threshold

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 be published either within one working day after it has been approved or on the defer date.

Part 1 – Deferral

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

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the 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:

James Broadhurst 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 26 January 2026.

ASSISTANT DIRECTOR, FINANCIAL SERVICES:

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

Signature

Date



12 February 2026