

3. Delivering the homes and neighbourhoods Londoners need

Draft London Plan (2026)

Key information

Publication type: The London Plan

Publication status: Draft

Publication date: Thursday 16 July 2026

Contents

[HN1 Increasing London's housing stock](#)

[Implementation](#)

[Rationale](#)

[HN2 Protecting and reshaping housing](#)

[Implementation](#)

[Rationale](#)

[HN3 Delivering affordable housing](#)

[Implementation](#)

[Rationale](#)

[HN4 Gypsy and Traveller Accommodation](#)

[Implementation](#)

[Rationale](#)

[HN5 Managing specialist accommodation](#)

[Implementation](#)

[Rationale](#)

[HN6 Build to rent](#)

[Implementation](#)

[Rationale](#)

[HN7 Housing size mix](#)

[Implementation](#)

[Rationale](#)

[HN8 Housing design](#)

[Implementation](#)

[Rationale](#)

[HN9 Accessible housing](#)

[Implementation](#)

Background

3.1 London faces an unprecedented challenge to deliver not only a significant number of new homes, but accommodation that is affordable and of varying types and tenures that can meet the broad needs of Londoners. Not only is diversification of supply a key part of meeting needs, it is also an important factor in supporting London's available sites to delivery, particularly in the context of difficult and uncertain economic conditions.

3.2 The London Plan is planning for 558,000 new homes between 2027 and 2036, with a goal of meeting the housing need figure set by the government of 850,000 homes as soon as possible in the following ten-year period. The Plan sets 10-year capacity-derived housing targets for London's local planning authorities. These targets take the most ambitious approach possible in the context of land and environmental constraints, and deliverability limitations in the shorter term (as set out in chapter 1). They reflect the commitment to making the most of brownfield opportunities and ensuring that these opportunities have been maximised, but do also require the use of Green Belt land (set out as separate components).

3.3 Delivering new homes is not just about achieving numbers. It is essential that London ensures choice, providing homes in the right locations and of the right size, tenure and type. The homes that are delivered also need to be good quality, and well-designed to provide appropriate levels of amenity.

3.4 Affordable housing is essential not just to ensure an inclusive city and healthy thriving communities, but also for London's growth and productivity, as expensive housing limits individuals' mobility and ability to access jobs. Affordability pressures must be addressed through social rent and intermediate tenure delivery and important Key Workers' needs must be considered as part of retaining London's economic and social vibrance.

3.5 There are inevitable limitations in the pace and scale of the build-out and delivery of market homes - arising from a vulnerability to changes in demand from potential buyers - and providing higher levels of affordable housing also plays a vital role in supporting delivery, as does increasing the growing role of Build to Rent in London's housing market. Both types of home serve not only to meet identified needs, but act to diversify sites and so reduce their overall exposure to 'market absorption' from buyer demand, which might otherwise slow down delivery.

3.6 Meeting the needs of London's diverse communities, be that Gypsies and Travellers, older people, students or those that require supported or accessible homes is also key to ensuring a truly successful and thriving city. These housing policies are designed to recognise and detail how local authorities and applicants should seek to address varying accommodation needs by supporting delivery of new homes and also protecting and managing existing housing stock where necessary.

3.7 The evidence is clear that affordable housing need in London is high. While the 2026 Strategic Housing Market Assessment (SHMA) shows that different levels of housing delivery over time result in different levels of affordable housing need (due to different household formation scenarios), that need still remains high. Delivering at a rate of circa 56,000 homes a year would mean that London's affordable housing need is 60 percent of overall supply.

3.8 Given that future delivery rates (which impact precise levels of need) cannot be known, the Mayor remains committed to a strategic target for London of 50 per cent of homes to be genuinely affordable over the longer-term plan period.

3.9 To help support affordable housing delivery, the Threshold Approach to Planning Applications is designed to incentivise development to come forward and to secure affordable housing as part of this. The approach in this Plan maintains this key principle and mechanism, but is also cognisant of viability challenges, reflecting what can be achieved in different parts of the city, on different types of land given variations in development values and costs. Where affordable housing thresholds are met this avoids the requirement to provide detailed viability information and is designed to continue to embed affordable housing expectations into land values, deliver certainty to market, and to speed up the planning process by reducing protracted viability discussions, in turn delivering the homes that Londoners need.

3.10 The Burial Space policy in turn sets out to ensure sufficiency of a form of social infrastructure that is important to many people as part of their faith and/or the natural life course. This is a form of infrastructure that is necessarily planned for on a cross-boundary basis reflecting the uneven distribution of capacity and differential opportunity for the formats required.

3.11 The sub-key diagram illustrates the Homes and Neighbourhoods policies spatially where relevant, but should be read in conjunction with the key diagrams in chapter 1 and the Places sub-key diagram in chapter 6.

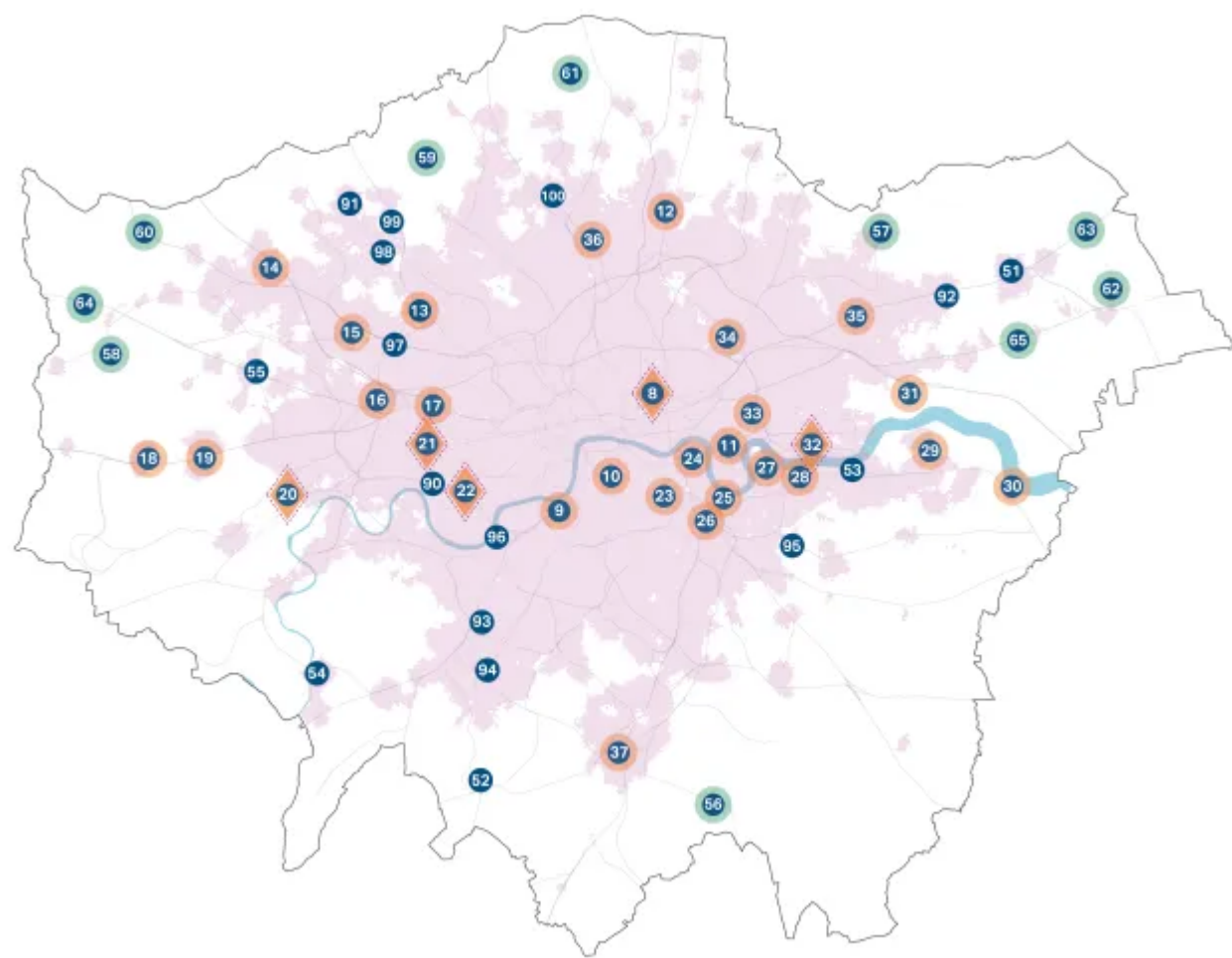


Figure -

3.1: Homes and Neighbourhoods sub key diagram

KEY

 Sustainable Access Measure Levels 4 and above

BLG: Brownfield First Opportunity Areas

- 

8

City Fringe/Tech City*

9

Vauxhall, Nine Elms and Battersea

10

Elephant and Castle

11

Isle of Dogs and South Poplar

12

Lee Valley

13

Brent Cross/Cricklewood/Staples Corner

14

Harrow and Wealdstone

15

Wembley

16

Old Oak/Park Royal

17

Kensal Canalside

18

Hayes

19

Southall

20

Great West Corridor*

21

White City*
Earl's Court/West

22

Kensington*

23

Old Kent Road

24

Canada Water
Deptford Creek/

25

Greenwich Riverside
New Cross - Lewisham -

26

Catford

27

Greenwich Peninsula

28

Charlton Riverside

29

Thamesmead and
Abbey Wood

30

Bexley Riverside

31

London Riverside

32

Royal Docks and Beckton
Riverside*

33

Poplar Riverside

34

Olympic Legacy

35

Ilford

36

Wood Green

37

Croydon



**BFOA's marked with an asterisk are also strategic economic clusters.*
- BLG: Brownfield Town Centre and Other
- 

51

Romford

52

Kingston

53

Sutton

54

Woolwich

55

Greenford

90

Hammersmith

91

Edgware

92

Chadwell Heath

93

North Wimbledon

94

South Wimbledon

95

Kidbrooke

96

York Road

97

Dollis Hill

98

Colindale

99

Grahame Park

100

Arnos Grove

BLG: Green Belt Residential-led Mixed Use



56

Croydon-New Addington

57

Eastern Hainault Loop

58

East of Ickenham

59

Mill Hill and Barnet

60

Northwood

61

Crews Hill and Chase
Park

62

Upminster

63

Harold Park

64

West Ruslip

Contains OS data © Crown copyright 2026

Figure -
3.1 key

Transcript for sub key diagram of figure 3.1

Pink area on map

Sustainable Access Measure Levels 4 and above

BLG: Brownfield First Opportunity Areas (BFOAs)

* (BFOAs marked with an asterisk are also strategic economic clusters)

8. City Fringe / Tech City*
9. Vauxhall, Nine Elms and Battersea
10. Elephant and Castle
11. Isle of Dogs and South Poplar
12. Lee Valley
13. Brent Cross / Cricklewood / Staples Corner
14. Harrow and Wealdstone
15. Wembley
16. Old Oak / Park Royal
17. Kensal Canalside
18. Hayes
19. Southall
20. Great West Corridor*
21. White City* (Earl's Court / West Kensington*)
22. Kensington
23. Old Kent Road
24. Canada Water / Deptford Creek
25. Greenwich Riverside -New Cross – Lewisham
26. Catford
27. Greenwich Peninsula
28. Charlton Riverside
29. Thamesmead and Abbey Wood
30. Bexley Riverside
31. London Riverside
32. Royal Docks and Beckton Riverside*
33. Poplar Riverside
34. Olympic Legacy
35. Ilford
36. Wood Green
37. Croydon

Brownfield Town Centre and Other

51. Romford
52. Kingston
53. Sutton
54. Woolwich
55. Greenford

90. Hammersmith
91. Edgware
92. Chadwell Heath
93. North Wimbledon
94. South Wimbledon
95. Kidbrooke
96. York Road
97. Dollis Hill
98. Colindale
99. Grahame Park
100. Arnos Grove

BLG: Green Belt Residential-led Mixed Use

56. Croydon – New Addington
57. Eastern Hainault Loop
58. East of Ickenham
59. Mill Hill and Barnet
60. Northwood
61. Crews Hill and Chase Park
62. Upminster
63. Harold Park
64. West Ruislip

HN1 Increasing London's housing stock

- **Policy aim:** To deliver homes that contribute towards meeting London's housing need.
- **Applies to:** All local plans
- **Locations:** All

Plan making

A Plan-making authorities through their local plans should, in line with policy MBUL1 Spatial Strategy:

- (1) adopt and plan for the individual ten-year housing targets set out in Table 3.1; and
- (2) positively plan for additional longer-term capacity of at least 850k up to 2047.

Table 3.1: Housing targets for Local Planning Authorities 2027/28 - 2036/37

Table 3.1: Housing targets for Local Planning Authorities from 2027/28 to 2036/37

Local Planning Authority	Brownfield housing target	Greenfield housing target	Total housing target
Barking and Dagenham	8,558	1,140	9,698

Local Planning Authority	Brownfield housing target	Greenfield housing target	Total housing target
Barnet	25,730	7,000	32,730
Bexley	6,217	-	6,217
Brent	25,316	-	25,316
Bromley	7,507	-	7,507
Camden	12,085	-	12,085
City of London	1,716	-	1,716
Croydon	15,944	5,600	21,544
Ealing	32,054	-	32,054
Enfield	14,062	7,000	21,062
Greenwich	27,850	-	27,850
Hackney	10,584	-	10,584
Hammersmith and Fulham	16,784	-	16,784
Haringey	19,030	-	19,030
Harrow	8,860	3,150	12,010
Havering	9,652	12,060	21,712
Hillingdon	9,280	14,750	24,030
Hounslow	17,975	-	17,975
Islington	6,768	-	6,768
Kensington and Chelsea	5,904	-	5,904
Kingston upon Thames	6,872	-	6,872
Lambeth	16,370	-	16,370
Lewisham	14,052	-	14,052
Merton	14,272	-	14,272
Newham	26,260	-	26,260
OPDC	11,335	-	11,335
Redbridge	10,730	5,400	16,130
Richmond upon Thames	5,397	-	5,397
Southwark	27,799	-	27,799
Sutton	4,781	-	4,781
Tower Hamlets	24,704	-	24,704
Waltham Forest	19,070	-	19,070
Wandsworth	26,609	-	26,609
Westminster	12,224	-	12,224
London Total	502,351	56,100	558,451

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.12 LPA housing targets may be planned for at the local level through either a stepped housing trajectory that varies requirements over the 10 years, or through equal division of the target on an annual basis. Housing targets are to be monitored by determining net supply.

3.13 Reflecting the lead-in times for delivery in Green Belt locations, the housing requirement for LPAs that have a greenfield component to their target will be set at the annualised equivalent of the brownfield target only for years 2027/28 to 2029/30. Typically, housing delivery on brownfield land across London should be prioritised over greenfield development in accordance with MBUL1 Spatial Strategy. Where LPAs have a greenfield component to their housing target they should plan for strategic growth to deliver against this assessed capacity. These should be advanced through Green Belt release in line with PV7 - Sustainable development and enhancement of the Green Belt. Any under delivery against brownfield targets should not be off-set at the local level by planning for increased delivery on greenfield land, particularly where this would involve land outside of identified BLGs.

3.14 Given that housing requirements are strongly tied to the viability context in most locations across London, targets are considered to be set at the minimum level and higher numbers are expected to be positively planned for (including in relation to capacity to achieve 850,000 homes) to enable delivery as viability conditions improve and over the longer term. The GLA will work with LPAs through its General Conformity process, to seek to embed the implementation of the Plan's approaches to optimise density and ensure that growth is positively planned for.

3.15 The housing targets in Table 3.1 are capacity based, with the evidence supporting the London Plan demonstrating the extent to which the identified housing needs of London can be accommodated (see the GLA's Strategic Housing Land Availability Assessment (2026) (SHLAA)). As such, when LPAs propose housing requirements in local plans, these should account for all of the identified capacity from the base date of the SHLAA 2026. This means planning to meet any shortfall from under-delivery over the elapsed part of Table 3.1's 10-year period as early as possible so as not to unnecessarily delay meeting identified development needs.

3.16 LPAs are encouraged to use the Land4LDN platform to prepare this evidence, and will be expected to demonstrate clear evidence that the identified capacity cannot be delivered sooner, with no available supply able to be brought forward from later in the plan period.

3.17 Any further sustainable locations or additional greenfield capacity identified above the figures in the brownfield target should be considered additional to the overall housing target in order to protect the Plan's brownfield first approach.

3.18 Student housing need is a component of general housing need and as such, the ten-year targets for PBSA set out in Table 3.6 of policy HN5 Managing specialist accommodation, are a component of the local planning authority targets in Table 3.1. As non-self-contained accommodation (NSC), PBSA will count towards meeting LPA housing targets on a 2.5:1 ratio, with two and a half bedspaces/units being counted as a single home.

3.19 NSC for older people should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom counted as a single home.

3.20 All other NSC communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home.

Rationale

This policy reflects a number of key considerations:

3.21 It is recognised that London has a very high need for housing of multiple types and tenures. However, the ability to deliver new homes is not simply linked to land availability, infrastructure capacity or environmental factors, but is constrained by viability, which is impacted by a wider macro-economic context that changes over time. As such, the SHLAA has taken this into account and derived a housing requirement for London and its constituent LPAs that incorporates assumptions around the potential achievability of representative types of development over the target-setting period.

3.22 The housing targets in Table 3.1 are reflective of the expected delivery associated with following the spatial strategy set out in MBUL1. The contribution which can be made from various brownfield and greenfield sources has been estimated through the SHLAA 2026, and reflects a level of development which meets housing need as far as possible. The Plan follows a brownfield first approach, bringing in greenfield development in a targeted manner to ensure that new development is in sustainable locations, is well connected and can be viably serviced.

3.23 Although it is typical for Mayoral Development Corporations (MDCs) where they are also the plan-making authority to have their own housing target, this is not the case for Oxford Street MDC – an area that contains limited capacity for new homes. This approach will ensure flexibility in delivery can be maintained across the wider borough.

3.24 In terms of the different ratios used to count NSC against the overarching housing target, this is based on the amount of self-contained housing this form of supply could free up on delivery.

HN2 Protecting and reshaping housing

- **Policy aim:** to ensure homes that meet Londoners' needs are protected or that the appropriate steps are taken to secure re-provision and to deliver overall benefits
- **Applies to:** all self-contained housing and non-self-contained accommodation
- **Locations:** all

Development management

A Development proposals for the loss of self-contained housing should be resisted, unless:

- (1) replaced with at least the existing overall floorspace and, wherever possible, uplifting existing densities, in line with MBUL2 Optimising the use of land and site capacity, and
- (2) in the case of social rent homes, providing replacement floorspace within that tenure, regardless of whether the replacement home facilitates a right to return or remain, or

(3) in the case of other low-cost rent and intermediate homes, providing replacement floorspace within that specific tenure or one that is more affordable as defined by the criteria in HN3 Delivering affordable housing.

B Development proposals for the loss of non-self-contained accommodation should ensure adequate replacement where it meets a need identified through strategic or local evidence, unless assessed and identified as surplus as part of a broader strategic approach.

C Development proposals for the demolition and replacement of affordable homes should:

(1) provide a robust assessment of the benefits and disbenefits of alternative options to this approach in the first instance

(2) weigh up the potential benefits of demolition and replacement against wider social and environmental impacts, and

(3) maximise the provision of additional affordable housing. These may follow the fast-track route where 50 per cent of the additional housing in the scheme is affordable and provided in line with the tenure and affordability requirements set out in HN3 Delivering Affordable Housing.

(D) Development proposals for modular temporary accommodation as a meanwhile use should be supported where possible.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.25 This policy applies to the loss of specialist and supported housing (SSH) accommodation (policy HN5) as well as more conventional housing. Although SSH is more likely to be classed as non-self-contained accommodation, some schemes depending on their individual format or circumstances may be self-contained homes.

3.26 Where evidence produced by the Mayor or the local planning authority indicates either a broader strategic need or a need within borough for such accommodation, its loss is not considered to be justified unless it can be demonstrated that need will still be met, for example through consolidation plans (as part of a wider estates planning exercise) or via absorption by alternative provision, without resulting in a strain on existing resources.

3.27 Policy criteria on the loss of affordable housing apply in all cases, including proposals for Estate Regeneration undertaken by boroughs, housing associations and their partners. Estate regeneration schemes are expected to take into account the Mayor's Good Practice Guide to Estate Regeneration particularly in relation to considering alternatives to demolition and engaging with residents, including the use of ballots. To secure Mayoral funding, strategic schemes involving demolition of affordable homes will be required (unless exempt) to demonstrate residents' support via a vote in favour of plans.

3.28 It is expected that existing affordable housing floorspace is re-provided and that additional affordable housing delivery is maximised in estate regeneration schemes. For schemes that meet the criteria in A, and that provide 50 per cent of the additional residential accommodation as affordable housing, viability testing will not be required, and the scheme will be able to follow the fast-track route. Affordable housing that is reprovided as

part of redevelopment should be measured by floorspace. Any net additional provision should be measured by habitable room, unless there are demonstrable reasons why measurement by floorspace is more appropriate.

3.29 Where estate redevelopment is taking place as part of a wider programme, it may be acceptable for affordable housing reprovion on individual estates to vary (taking account of the wishes of people who want to return to the estate), if the overall level of provision and tenure is maintained across the programme in accordance with A(1) and A(2), and where the approach is acceptable to the borough and, where relevant, the Mayor.

Rationale

This policy reflects a number of key considerations:

3.30 Meeting London's housing need is not simply about building new homes, it is also about retaining or managing the loss of existing stock where there is a clear rationale for doing so. In the case of self-contained housing, where needs are high for both market and affordable homes, it is not acceptable for loss to occur unless replaced with increased floorspace provision and/or tenures that are at least as affordable.

3.31 The need for different types of non-self-contained homes is more sensitive to fluctuations over time than that of conventional housing, and requires a more flexible approach. This need tends to be more localised and impacted by factors such as funding streams available and changes in national policy. As such, in the case of redevelopment, it is necessary to require evidence that any loss of capacity can be absorbed by other provision or that a need no longer exists in that location.

3.32 The Mayor remains committed, in the case of proposals to demolish affordable housing including estate regeneration schemes, that due consideration is given to alternative approaches and that benefits are clearly demonstrated.

3.33 In the case of redevelopment of affordable housing, the requirement that any reprovion be measured by floorspace versus any new provision by habitable room, is designed to account for that fact that existing homes may not meet space standards. Floorspace reprovion would therefore be a sufficient measure to meet policy requirements.

3.34 In terms of temporary accommodation as a meanwhile use, the plan recognises that modular housing may play a role in optimising underutilised land in the short-term, whilst addressing urgent local housing need.

HN3 Delivering affordable housing

- **Policy aim:** to deliver affordable housing to contribute to meeting London's need as set out in London's SHMA.
- **Applies to:** proposals for homes of 10 units or above
- **Locations:** all

Plan-making

A Plan-making authorities should:

- (1) maximise the delivery of genuinely affordable housing to contribute to London’s 50 per cent strategic affordable housing target
- (2) seek to collectively deliver 219,940 low-cost rent and 119,940 as intermediate homes by 2037 reflecting the extent of need
- (3) follow the Threshold Approach to Planning Applications as set out in the development management section of this policy for referable and non-referable planning applications
- (4) draw up and publish allocations policies and maintain housing registers for intermediate homes, alongside any other measures considered necessary to ensure fair and transparent allocation for intermediate homes; and
- (5) give priority access to intermediate homes to key workers.

Development management

B Development proposals should maximise the delivery of genuinely affordable housing to:

- (1) contribute to London’s strategic target of achieving 50 per cent affordable housing; and
- (2) seek to collectively deliver 219,940 low-cost rent and 119,940 intermediate homes by 2037 reflecting the extent of need.

C Proposals for residential development are subject to the Threshold Approach to Planning Applications and should follow the fast-track route through planning, where they provide the relevant percentages of affordable housing on gross residential development in the locations or on the land profiles set out in Table 3.2 and Table 3.3:

Table 3.2: Affordable housing requirements for schemes of 36 homes or more

Table 3.2: Affordable housing requirements for schemes of 36 homes or more			
Location or land profile 44	Affordable housing requirement	Circumstances under which the threshold affordable housing requirement is altered	Altered affordable housing requirement
Location band A	35 per cent	Development is for 100% social rent homes	25 per cent
		OR 100% Key Worker Living Rent Homes in the case of BtR development	

Location or land profile 44	Affordable housing requirement	Circumstances under which the threshold affordable housing requirement is altered	Altered affordable housing requirement
Location band B	25 per cent	Development is for at least 80% social rent homes	20 per cent
		OR at least 80% Key Worker living rent homes in the case of BtR	
Location band C	20 per cent	None	N/A
Green?Belt land	50 per cent	Development is proposing significant transport infrastructure delivery	35 per cent
Public sector land	40 per cent	Development is proposing significant strategic transport (or in some limited cases – subject to agreement with the GLA – strategic health) infrastructure delivery	25 per cent
		OR is part of a?Public Sector Land Portfolio?Agreement with the Mayor	
Industrial land	35 per cent	None	N/A

Table 3.3: Affordable Housing requirements for schemes of 10-35 homes

Table 3.3: Affordable Housing requirements for schemes of 10-35 homes

Location or land profile 45	Affordable housing requirement	Circumstances under which the threshold affordable housing requirement is altered	Altered affordable housing requirement
Non-Green?Belt land	20 per cent	None	N/A
Green?Belt land	50 per cent	None	N/A

(D) In addition to the threshold levels set out in C, development proposals for schemes of 10 homes or more should provide the following to take the fast-track route through planning:

- (1) a tenure split of at least 60 per cent low-cost rent homes and 40 per cent intermediate homes; or
- (2) a tenure split that is acceptable to the borough or the Mayor when providing 75 per cent or more affordable homes; or
- (3) in the case of BtR development a tenure split of at least 30 per cent Key Worker Living Rent homes and a maximum of 70 per cent at a range of genuinely affordable rents.

E Where the relevant thresholds set out in C and D(1) are exceeded, the tenure split for affordable housing provided above the relevant threshold is flexible.

F Proposals for older persons' accommodation are subject to the Threshold Approach to Planning Applications and should follow the fast-track route through planning, where they provide the relevant percentages of affordable housing on gross residential development in the locations or on the land profiles set out in Table 3.2. In terms of tenure split requirements, this may differ from that set out in D(1) and (2) where acceptable to the Mayor or the LPA.

G Development proposals for the demolition and replacement of affordable homes should follow the fast-track route where 50 per cent of the additional housing is affordable and continues to meet the criteria set out in D and HN2 Protecting and reshaping housing stock parts A(1) and (2)

H Development following the fast-track route through planning should undergo an Early Stage Viability Review if substantial implementation of the scheme has not been made within two years, or a period agreed by the borough, of permission being granted.

I Development proposals following the fast-track route through planning will not need to submit viability information for scheme amendments, provided that the development continues to meet the criteria set out in C and D.

J Development should:

- (1) ensure affordable housing is provided on site other than in exceptional circumstances where it is demonstrated that this cannot be achieved, or where off-site provision would result in a higher level of affordable housing or affordable housing that more effectively addresses housing need; and
- (2) only provide payment-in-lieu contributions exceptionally where acceptable to the LPA, or the Mayor for referable applications, calculated in line with the Mayor's Viability guidance; and
- (3) ensure off-site provision or payment-in-lieu contributions deliver affordable homes that are additional to those required under C and D on any associated site.

K Development will follow the viability tested route through planning and provide viability information in support of the application, where:

- (1) it is not possible to meet the requirements set out in C and D; or
- (2) development will result in the demolition or loss of existing affordable housing, or is an estate regeneration scheme, except where G applies; or
- (3) a payment-in-lieu contribution is provided, with the exception of developments providing 10-35 homes, where the LPA assesses that the contribution is equivalent only to the relevant threshold level and tenure of affordable housing set out in C and D.

L Development proposals for Purpose-built Student Accommodation are subject to the Threshold Approach to Planning Applications and should follow the fast-track route through planning, where they provide either:

- (1) On-site affordable student accommodation at the relevant percentages in the locations or on the land profiles set out in Table 3.2; or

(2) On-site affordable student accommodation up to a maximum of 10 per cent below the relevant percentages in the locations or on the land profiles set out in Table 3.2, together with a payment-in-lieu contribution for conventional affordable housing to off-set the reduction in on-site delivery; or

(3) On-site conventional affordable housing at the relevant percentages in the locations or on the land profiles set out in Table 3.2.

M Development proposals for Large-scale Purpose-built Shared Living are subject to the viability tested route through planning and should provide a payment-in-lieu contribution towards conventional affordable housing, except where on-site conventional affordable housing is provided at the relevant percentages in the locations or on the land profiles set out in Table 3.2, enabling applications to follow the fast-track route through planning.

N Development proposals following the viability tested route through planning should:

(1) demonstrate that there are genuine barriers to delivery that mean the scheme would not be able to proceed on a policy compliant basis

(2) demonstrate that the scheme is providing the maximum possible level of affordable housing

(3) undergo an 'Early Stage' Viability Review if 'substantial' implementation is not 'achieved' within two years, or a period agreed by the borough, of permission being granted

(4) undergo a Late Stage Review when 75 per cent of the units in a scheme or final phase or plot are occupied, or a requirement agreed by the borough

(5) undergo Mid Term Reviews prior to implementation of phases for larger schemes.

O When assessing the maximum possible level of affordable housing proposed, decision makers should consider whether the assessment and its conclusions are objective, reasonable and realistic, whether this shows that the scheme is deliverable and the weight to be given to the assessment and the proposed level of affordable housing as part of the overall planning balance.

P Development that seeks to reduce the level of affordable housing in an existing planning consent, or that results in a less affordable tenure, should be scrutinised carefully. The applicant should provide a robust justification, including how circumstances have changed since the main consent was issued. Where the level or tenure of affordable housing is reduced below the relevant threshold or other requirement set out in this policy, it will be assessed through the Viability Tested Route. The decision-maker should have regard to the potentially significant reduction in public benefits that changes to affordable housing may cause and give this appropriate weight in the overall planning balance, alongside the wider merits of the scheme.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.35 The percentages set out in the Threshold Approach to Planning Applications apply to both market sale and Build to Rent housing.

3.36 The fast-track route through planning does not require a viability assessment to be submitted at the planning application stage. Local planning authorities should not impose additional requirements for applicants in order to meet the fast-track route.

3.37 Where the fast-track route cannot be taken, the viability tested route will scrutinise the viability information provided to assess the maximum possible contribution to affordable housing that a scheme can make. Viability information is expected to be provided in accordance with the Mayor's Viability guidance, submitted in a standardised and accessible format and treated transparently. Inputs, assumptions and conclusions will need to be fully justified, objective and impartial, recognising the public interest.

3.38 Comprehensive review mechanisms will be applied to schemes to ensure that affordable housing is increased if market conditions improve viability over time. This includes an Early Stage Review for all applications regardless of the route they follow, to incentivise an applicant to build out the permission.

3.39 Applicants are expected to maximise the delivery of affordable housing through grant and other forms of subsidy where applicable and available, engaging in early discussions with the council, RPs and the GLA to explore availability, and improve the design, integration and management of different tenures, reflecting council and RP requirements. Where grant is, or is likely to be available, this should be taken into account as part of the planning application, and the applicant should commit to a higher level of affordable housing.

3.40 Local Planning authorities that fall into location B or C, may explore increasing the threshold through their local plan to the relevant adjacent higher locational threshold if economic conditions improve and it can be demonstrated to be deliverable through robust local viability evidence. Any threshold set should cover the entire extent of the local planning authority boundary and should not exceed the threshold of location A unless there is clear evidence that this can be delivered in practice.



KEY

- Location Band A - 35%
- Location Band B - 25%
- Location Band C - 20%

Contains OS data © Crown copyright 2026

Figure -
3.2: showing the locational bands for the Threshold Approach

Transcript to the key for figure 3.2

Green area

Location Band A - 35%

Yellow area

Location Band B - 25%

Pink area

Location Band C - 20%

3.41 The 40 per cent requirement of sites on public sector land set out in Table 3.2, applies to any new portfolio agreements made on or after the publication of this London Plan. Sites permitted within portfolio agreements made prior to this date remain in place and subject to the framework in place at the time of their creation and are not superseded by this Plan.

3.42 The measurement for affordable housing is expected to be habitable rooms, with habitable rooms in affordable and market homes being of a comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure affordable housing provision using habitable floorspace. To enable comparison, applicants are expected to present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace. Where a scheme comprises both market sale and Build to Rent homes, while the relevant parts of the policy will apply to the market or rent element, the scheme will be assessed as a whole, with affordable housing calculated as a proportion of total habitable rooms across the scheme.

3.43 Where in-lieu payments are justified for schemes of 10-35 homes (in accordance with the approach set out in policy) plan-making authorities may set tariff rates for contributions provided they are determined in line with the approach set out in the Mayor's Affordable Housing guidance.

3.44 When opting to provide a proportion of the affordable housing required for Purpose-built Student Accommodation (PBSA) schemes as an affordable housing payment in-lieu, applications are expected to take the following steps:

- (a) Identify the amount of Net Internal Area floorspace relating to the proportion of floorspace which will be offered as an affordable housing payment in-lieu
- (b) Determine the capitalised value of the floorspace on the basis of both market tenure PBSA and as affordable tenure PBSA
- (c) Subtract the two figures in steps 1 and 2 to identify the difference in value which will equate to the required payment in-lieu contribution.

3.45 For Large-scale Purpose-built Shared-living Accommodation, payment-in-lieu of affordable housing is expected to typically be provided as an upfront payment to the LPA. It should be calculated in line with the approach to off-site contributions set out in the Mayor's Affordable Housing guidance. Applicants that meet these expectations will not be subject to a Late Stage review.

3.46 Given the extent of affordable housing need identified in the 2026 SHMA, the delivery of a borough's housing target should not be relied on as a reason for reducing affordable housing delivery or other policy requirements.

3.47 Significant strategic transport infrastructure is defined as the schemes set out in MBUL1 Spatial Strategy. Strategic health infrastructure is defined as schemes that will make a significant contribution, particularly to acute healthcare requirements set out in Annex F (e.g. new hospital facilities).

3.48 The Mayor's preferred affordable housing tenures are set out below. Other affordable housing products may be acceptable if they are genuinely affordable, meet the definition of affordable housing and can achieve the relevant eligibility and affordability criteria.

- Social Rent
- Key Worker Living Rent
- London Living Rent
- London Shared Ownership

3.49 To ensure affordable homes remain affordable to the households that need them, the following criteria apply:

- Key Worker Living Rent and London Living Rent rents set according to guidance provided on the GLA website
- Intermediate Rent and Sale is affordable to households on incomes up to the maximum threshold published by the Mayor, and homes should be provided for a range of incomes below this threshold
- Annual housing costs including mortgage, rent and service charge, should be no greater than 40 per cent of net household income based on household income limits.

3.50 In terms of priority access to intermediate housing for those on local intermediate registers, whilst this is the expectation for new development and re-lets of intermediate rent homes, it is recognised that it may not be possible for London Shared Ownership re-sales, where this might cause a delay in the sale.

3.51 In the case of intermediate tenures, LPAs will need to assess affordability in accordance with the above criteria. Eligibility criteria may be supplemented by other eligibility or priority criteria for intermediate homes that reflect local need or circumstance and LPAs should work with housing providers to apply these criteria through any adopted intermediate housing allocations policies and processes. The Mayor also encourages LPAs and housing providers to prioritise key workers who also meet the eligibility criterion above, for intermediate homes. Boroughs may also prioritise those in other occupations for which there is a need locally; and/or give additional priority to those in occupations for which there is the greatest need; and/or prioritise staff of specific institutions for homes developed on land owned by or close to that institution.

3.52 Any additional eligibility or priority criteria will only apply for three months after practical completion of the unit. If a home has not been sold or let to a household who meet additional criteria within that period, it can be made available to any household that meets the London Plan criteria above, to ensure the intermediate homes are not left vacant.

3.53 The threshold levels set out in policy will be monitored and reviewed at appropriate points in time to determine how it is influencing delivery rates. Any changes to the thresholds will be made through London Plan Guidance or a focused review of the London Plan.

Rationale

This policy reflects a number of key considerations:

3.54 The extent of affordable housing need in London is high, as evidenced by the levels of homelessness across the city, the vast sums being spent by local authorities on temporary accommodation and the increasing numbers of households, including key worker households, that are very unlikely to secure social rent homes but are priced out of homes for sale or rent on the open market. The SHMA sets out the quantum of affordable housing required to address need over a ten-year period – this demonstrates the importance of developments doing the utmost to maximise levels of affordable housing, particularly when it comes to social rent.

3.55 Not only do sites delivering low levels of affordable housing mean that the gap between need and supply continues to grow, it poses significant opportunity costs which will continue to impact in the medium to long term given land scarcity in London. Moreover, affordable housing's ability to provide cash flow in a development means that providing higher levels of affordable housing forms a vital part of the strategy to increase overall housing delivery. This reduces a site's exposure to market absorption sales rates, which ultimately limit the number of market homes that can be sold and therefore the overall rate that a site can be built out.

3.56 Boroughs have systems in place to allocate social rent homes to those in need of them through their role as the local housing authority. This is however not consistently the case for intermediate housing, whereby opportunities to take up new homes may not be as readily understood by local people that are eligible for them. There is also a lack of parity across London, with only some boroughs having introduced allocations policies and housing registers to better direct intermediate homes towards local need. All boroughs are therefore asked to introduce the relevant systems and processes that will facilitate the future take up of intermediate homes, benefiting many households across the capital, including key workers, regardless of where they currently live.

3.57 The Mayor's 50 per cent strategic target for affordable housing reflects a number of factors. It is vital to retain an overarching ambition for the delivery of affordable housing in order to maximise the opportunities for its delivery, particularly in the context of the continued high level of need. It is considered most appropriate to retain this ambition and preferable to relying on a percentage that may fluctuate through unknowable future delivery rates, that are in turn impacted by macroeconomic cycles and land viability. Conversely, reducing the figure to a level that would currently be more generally viable across London would not reflect the realities of need and the Mayor's duties in relation to inclusion, health and inequality. However, both the level of need (in numerical terms) and the viability context (in relation to threshold affordable housing percentages) are recognised in policy and this aims to strike an appropriate overall balance in the approach. LPAs and applicants are asked to maximise affordable housing delivery with the objective of collectively addressing it.

3.58 The Threshold Approach to Planning Applications, informed by viability testing, recognises what can be achieved in different parts of the city, on different types of land given variations in development values and costs and the potential scope for value growth over the Plan period. This reduces the requirement to provide detailed viability information where affordable housing thresholds are met and is designed to continue to embed affordable housing expectations into land values, deliver certainty to the market, and speed up the planning process by reducing protracted viability discussions, in turn delivering the homes that Londoners need.

3.59 The approach seeks to deliver the highest possible level of affordable housing across boroughs, with the different bands reflecting broader variations in the viability context (and also growth potential over the Plan period). It is led by evidence of viability in the medium term and boroughs could move bands subject to robust

evidence of deliverability and if economic conditions improve through the course of the Plan. It seeks to strike a balance between avoiding different requirements in each borough for developers to navigate while allowing scope to reflect key differences across London and potential scope to deliver more affordable housing over economic cycles. The ambition is for London to get back to achieving a minimum of 35% affordable housing on private land across the whole of London, as economic conditions allow.

HN4 Gypsy and Traveller Accommodation

- **Policy aim:** to meet the accommodation needs of Gypsy and Traveller and Travelling Showperson households by providing pitches, plots and other culturally appropriate accommodation
- **Applies to:** plans and applications for Gypsy and Traveller and Travelling Showpeople accommodation
- **Locations:** all

Plan-making

A Plan-making authorities should seek to meet the needs of London's Gypsy and Traveller and Travelling Showpeople communities and should:

- (1) adopt the targets set out in Table 3.4 and Table 3.5 as a minimum
- (2) make provision for other types of culturally suitable accommodation where there is a need
- (3) consider granting permanent permission for temporary sites where these are in suitable locations
- (4) identify areas of potential extra capacity within or adjacent to existing sites
- (5) provide pitches or plots and other culturally suitable accommodation as part of large scale residential and mixed-use allocations and regeneration proposals where there is scope to do so
- (6) identify pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space and landscaping).

B LPAs should allocate a Gypsy and Traveller transit site and/or make provision for negotiated stopping.

C LPAs are encouraged to work collaboratively with providers, community organisations and the GLA with the aim of securing provision for and delivery of permanent pitches, plots, transit sites and other culturally suitable accommodation.

Development management

D Development proposals that would entail the loss of Gypsy and Traveller pitches and Travelling Showpeople plots should secure replacement provision that is equivalent or better in terms of size, quality and suitability of location.

- E Where existing Gypsy and Traveller pitches or Travelling Showpeople or Circus People’s sites or plots have to be re-located or re-provided, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible.
- F Development proposals for new sites should ensure sites will be well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.
- G Pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for all, including disabled and older people, and families with young children.

Implementation

- In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:
- 3.60 Targets for new permanent pitches and plots set out in Table 3.4 and Table 3.5 are considered to be a minimum in terms of level of provision sought and LPAs are encouraged to exceed these based on local context.
- 3.61 An estimated 87 transit pitches are needed across London. Transit provision can comprise permanent transit sites or negotiated stopping arrangements. Which type of provision is most appropriate will depend on local circumstances.
- 3.62 When planning provision for new pitches it is important to consider the wider context both in terms of what type of accommodation households seek and where provision should be made. For example, culturally suitable accommodation might include a combination of pitches and bricks and mortar homes on the same site or group housing to accommodate extended families. Understanding communities' preferences and needs, including targeted engagement, is key to ensuring new provision is culturally appropriate and meets needs in terms of type of accommodation, design, location and layout.
- 3.63 Involving residents occupying pitches, sites or plots in planning new provision or any unavoidable re-locations should help ensure satisfactory solutions are achieved.
- 3.64 It is unlikely that all of London’s need for pitches can be met on existing developed land. It is therefore expected that Green Belt sites will be needed in some cases, in which case policy PV7 applies.
- 3.65 To assist boroughs in meeting identified need, Mayoral funding is available through the London Social and Affordable Homes Programme 2026 - 2036 [46](#) for the provision of new sites and pitches and for refurbishment or remodelling of existing sites and pitches.

Table 3.4: 10 year targets (2027/28 - 2036/37) for net additional permanent pitches

Table 3.4: 10 year targets (2027/28 to 2036/37) for net additional permanent pitches		*Hammersmith and Fulham need is shared with Kensington and Chelsea
LPA*	Number of pitches	
Barking and Dagenham	17	
Barnet	16	

LPA*	Number of pitches
Bexley?	39
Brent?	55
Bromley?	77
Camden?	11
City of London?	0
Croydon?	25
Ealing	11
Enfield	25
Greenwich	53
Hackney	40
Hammersmith and Fulham	24
Haringey	33
Harrow	13
Havering	73
Hillingdon	49
Hounslow	35
Islington	10
Kensington and Chelsea	0
Kingston upon Thames	52
Lambeth	17
Lewisham	12
Merton	9
Newham	34
Old Oak Park Royal Development Corporation (OPDC)	13
Redbridge	21
Richmond upon Thames	5
Southwark	41
Sutton	16
Tower Hamlets	17
Waltham Forest	20
Wandsworth	7
Westminster	6
Total	876

Table 3.5: 10-year targets (2027/28 - 2036/37) for Travelling Showpeople permanent plots

Table 3.5: 10-year targets (2027/28 to 2036/37) for Travelling Showpeople permanent plots

LPA	Number of plots
Bromley	37
Havering	5

LPA	Number of plots
Hillingdon	13
Hounslow	28
Total	83

Rationale

This policy reflects a number of key considerations:

3.66 London must plan to meet the needs of all its residents, including Gypsies, Travellers and Travelling Showpeople. Targets for pitches and plots are introduced in recognition that past delivery has been slow and that need exists for Gypsy and Traveller pitches across London, albeit the level varies from borough to borough. Targets are minimum, reflecting a degree of uncertainty regarding Census data for these groups and given the pattern of historical underdelivery that urgently needs addressing.

3.67 There is a growing recognition that meeting Gypsy and Traveller need is not just about delivering pitches, but culturally appropriate accommodation that recognises Gypsies and Travellers' accommodation preferences. Involving existing or future residents in planning new provision is crucial to ensure that it is fit for purpose.

3.68 Requiring boroughs to consider a range of options for meeting needs, including as part of large scale developments, should make it more likely that suitable sites will be identified and new pitches delivered. It should also assist in facilitating an inclusive approach to development, that seeks to address the needs of all groups.

HN5 Managing specialist accommodation

- **Policy aim:** to secure the delivery and management of good quality specialist and supported housing that meets the varied needs of Londoners
- **Applies to:** applications for Purpose-built Student Accommodation (PBSA), Large-scale Purpose-Built Shared Living (LSPBSL) and Specialist, Supported and Older Person's Accommodation
- **Locations:** all

Plan-making

A Plan-making authorities should recognise the role that different accommodation types play in diversifying the market and speeding up build-out, and through local plans, should:

- (1) seek to meet the need for PBSA, identifying positive opportunities for its contribution to local and strategic objectives, allocating sites for a level of provision that will satisfy targets in Table 3.6
- (2) identify if and where spatial concentrations or proliferation of PBSA or LSPBSL accommodation exist compared to conventional housing, and the extent to which it is impacting the ability to ensure mixed, inclusive neighbourhoods and develop policy to address this

- (3) plan to meet the need for Specialist, Supported and Older Person's Accommodation using Table 3.7 as a starting point, alongside any local and other relevant evidence, and
- (4) take a positive approach to non-traditional forms of housing, including intergenerational and community-led housing, where there is evidence of need and where this does not undermine the requirement to optimise sites set out in MBUL2 Optimising the use of land and site capacity.

B Local Planning Authorities should plan to deliver Specialist, Supported and Older Persons Accommodation in areas that are well-connected to local services, facilities and social infrastructure by public transport.

Development management

C Development proposals for PBSA and LSPBSL accommodation should:

- (1) be in locations demonstrated to be well-connected to local services or, where relevant, higher education providers by walking, cycling and public transport, including and as part of, mixed-use regeneration and redevelopment schemes
- (2) be carefully located, designed and managed to optimise its impact on neighbourhoods' mixed and inclusive nature and
- (3) provide affordable housing in line with Policy HN3 Delivering Affordable Housing.

D Development proposals for LSPBSL should:

- (1) be under single management
- (2) where the provider issues licences to residents, offer these for a minimum period of three months and
- (3) be accompanied by a management plan that demonstrates continued accommodation quality through management and maintenance of the internal and external building and details security and safety procedures, and service arrangements.

E The design of LSPBSL should be of good quality:

- (1) placing emphasis on communal living, providing communal facilities and services that includes both indoor and outdoor space that aims to remove barriers to social interaction and encourages engagement and
- (2) providing functional personal living space, that does not encourage self-containment.

F Development proposals for Older Person's Accommodation should provide affordable housing in line with Policy HN3 Delivering Affordable housing.

G Development proposals for Specialist, Supported and Older Person's Accommodation should be designed to satisfy the requirements of the intended residents.

H Development proposals for Older Person's Accommodation, and where necessary to meet residents' need, for other specialist/supported housing should ensure pick up and drop off facilities close to the principal entrance suitable for taxis, minibuses and ambulances.

I Affordable PBSA should be secured through a Nomination Agreement for occupation by students of one or more higher education provider(s).

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.69 A positive approach should be taken towards the provision of PBSA in suitable locations to satisfy targets in Table 3.6. London's cumulative PBSA target is for 31,500 bedspaces required in the next decade. Updates on bedspace completions from the baseline date of 2026 will be published as part of London Plan monitoring updates. Where completions take place between the baseline date and plan start date, these can be netted off from the relevant borough's target.

3.70 Targets contained within Table 3.6 will be kept under review, acknowledging that need for PBSA accommodation may be impacted by contextual changes in the higher education sector.

Table 3.6: PBSA requirement by local planning authority from 2027/28 - 2036/37

Table 3.6: PBSA requirement by local planning authority from 2027/28 to 2036/37	
LPA	PBSA target (bedspaces)
Barking and Dagenham	300
Barnet	2,127
Bexley?	-
Brent?	1,582
Bromley?	300
Camden?	725
City of London?	-
Croydon?	1,347
Ealing	2,003
Enfield	1,316
Greenwich	1,741
Hackney	662
Hammersmith and Fulham	1,049
Haringey	1,189
Harrow	781
Havering	1,303
Hillingdon	1,562
Hounslow	1,123
Islington	300
Kensington and Chelsea	300

LPA	PBSA target (bedspaces)
Kingston upon Thames	300
Lambeth	1,023
Lewisham	878
Merton	-
Newham	1,576
Old Oak Park Royal Development Corporation (OPDC)	680
Redbridge	1,008
Richmond upon Thames	-
Southwark	1,737
Sutton	300
Tower Hamlets	1,482
Waltham Forest	1,192
Wandsworth	1,663
Westminster	-
Total	31,549

3.71 Areas that are well-connected to services and higher education providers (HEPs), provide a starting point for both LPAs seeking to allocate sites to satisfy PBSA provision and applicants seeking to ensure that C(1) is met. A travel distance of 30 minutes (via walking, cycling or public transport) is considered to be well-connected to an HEP.

3.72 Whilst it is incumbent upon the applicant to ensure LSPBSL accommodation and PBSA is carefully located, designed and managed for the positive benefit of mixed and inclusive neighbourhoods, the LPA may wish to use the local plan to define any aspects that might be spatially relevant for an applicant to consider.

3.73 Where all bedrooms in PBSA schemes are provided at a rental cost that qualifies as affordable student accommodation and are maintained in perpetuity through legal agreement or condition, a Nomination Agreement with a higher education provider is not required. There is also no requirement for the higher education provider linked by Nomination Agreement to Affordable PBSA to be located within the borough where the development is proposed.

3.74 LSPBSL development, as a product offering choice in the housing market, should not be subject to a restriction on the groups or demographics that may wish to live there - for example, students, key workers or those requiring emergency or temporary accommodation. LSPBSL management plans are expected to be secured through a Section 106 Agreement.

3.75 Supported, Specialist and Older Persons Accommodation policy applies to accommodation as defined in the glossary of this plan. LPAs should plan for a range of provision, including market, intermediate and social rented, and may wish to take a local approach including through site allocations to cater for needs.

3.76 The Supported Housing (Regulatory Oversight) Act 2023 (SHROA) places a statutory duty on local authorities in England to develop and deliver Local Supported Housing Strategies by March 2027. It requires local authorities to assess the current availability of supported housing (including older person's supported housing) and likely need (including current unmet need) for supported housing for a period of five years from

the date that the strategy is published.

3.77 Until such time as local needs assessments are undertaken in accordance with SHROA, Table 3.7 below is provided for local authorities to address local needs. Boroughs may need to draw on local and other relevant evidence, in addition to Table 3.7, regarding the level and type of older person's provision to be sought.

3.78 Table 3.7 should be treated as minima as needs figures for older persons housing do not account for needs within the private market (such as private sector retirement housing) which will form part of wider housing need across London. Local assessments are also not expected to capture this type of specialist older person's accommodation need, and this should be taken into account in any local targets (see the London SHMA). Evidence collected for the Local Supported Housing Strategy, and other relevant evidence⁴⁷ is expected to be used as a basis for addressing specialist housing needs.

3.79 The OPDC, as a Mayoral Development Corporation (MDC), is not provided with a needs figure. It is expected that the need for specialist, supported and older persons' housing be accounted for based on a reasonable proportion of need that would occur within the OPDC area, by liaising with respective housing authorities through the local plan process and where necessary, through the development management process.

Table 3.7: Additional supported, specialist and older persons' housing units needed 2025-35

Table 3.7: Additional supported, specialist and older persons' housing units needed 2025-35

Local authority	Transitional supported housing	Long-term supported housing	Older persons housing
Barking and Dagenham	60	25	245
Barnet	130	80	1,170
Bexley?	25	25	655
Brent?	165	40	675
Bromley?	85	40	945
Camden?	40	10	575
City of London?	5	<5	55
Croydon?	215	10	1,260
Ealing	130	0	1,115
Enfield	85	55	400
Greenwich	190	20	460
Hackney	325	30	775
Hammersmith and Fulham	25	5	350
Haringey	135	0	665
Harrow	35	35	600
Havering	60	55	515
Hillingdon	100	60	425
Hounslow	60	40	655
Islington	300	15	525

Local authority	Transitional supported housing	Long-term supported housing	Older persons housing
Kensington and Chelsea	145	0	750
Kingston upon Thames	5	25	120
Lambeth	370	20	1,330
Lewisham	55	10	825
Merton	25	20	460
Newham	200	70	680
Redbridge	50	50	615
Richmond upon Thames	30	30	510
Southwark	310	105	1,050
Sutton	70	10	745
Tower Hamlets	385	125	825
Waltham Forest	175	10	635
Wandsworth	255	90	1,205
Westminster	235	5	990
London	4,490	1,110	22,805

Source: The Supply and Demand for Supported Housing in London, Final Report for GLA, Sheffield Hallam University, 2026

*Older persons' housing: for people aged 55+ with support needs. Excludes older persons' housing for sale or rent on the private market

N.B Column totals may not match totals displayed due to rounding

3.80 Design and access statements for specialist and supported accommodation are expected to demonstrate how the requirements of the specific user group have informed the design and functionality of the final proposal.

Rationale

3.81 London is a diverse city and there is a need to plan positively for some specialist housing needs and manage their impacts, particularly in relation to availability of land for conventional housing.

3.82 A positive approach to the provision of PBSA will ensure a thriving higher education sector is supported and will offer students choice of accommodation, in turn alleviating pressure on the private rented sector, freeing up homes that students might otherwise occupy. However, both PBSA and LSPBL require careful planning to ensure that schemes are well designed and delivered in suitable locations, to maximise their benefits, and to reduce knock-on effects such as overconcentration in certain areas. To help to achieve this, PBSA targets have been determined through a methodology that seeks to align need from HEPs with appropriate locations for PBSA development, as well as to ensure requirements are appropriately spread across the capital.

3.83 It is the case that some forms of specialist housing, such as community-led housing, may help to enhance social cohesion and increase well-being. As such the policy seeks a positive approach to its planning at the local level, where relevant.

3.84 Supported, Specialist and Older Persons' Accommodation is a varied market comprising many different types and formats of housing that can meet a wide range of needs, as appropriate for a diverse city such as London. For example, provision for those requiring additional support after leaving hospital may be quite different from that for victims of domestic violence. Even housing geared towards those within the same demographic may be wide-ranging – for example older persons' housing may or may not have tailored specialist care elements and will vary in its offer as part of providing choice based on a persons' requirements and socio-economic status.

3.85 Given London's ageing demographic, it is important that LPAs plan for a range of provision, both market and social rented, to cater for needs.

HN6 Build to rent

- **Policy aim:** to facilitate a housing product that addresses identified housing needs; and to encourage boroughs to take a supportive approach to the BtR sector
- **Applies to:** Build to Rent (BtR) (major development)
- **Locations:** all

Plan making

A Plan-making authorities should take a positive approach to BtR development and its role in meeting the housing targets set out in policy HN1 Increasing London's housing stock which may include allocating sites in full or in part for this type of development through Local Plans.

Development management

B Development proposals for BtR development should:

- (1) ensure homes are secured as BtR under covenant for at least 15 years and that a clawback mechanism is in place in the event that the covenant is broken
- (2) provide self-contained homes that are separately let
- (3) consider the impact of service charges on long-term affordability in line with policy HN8 Housing design, and
- (4) provide affordable housing as discounted market rent and including Key Worker Living Rent homes, in line with HN3 Delivering affordable housing, ensuring these homes are secured in perpetuity as affordable housing.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.86 BtR is a type of conventional housing that meets the criteria set out above. As such, it is subject to policies of this plan which apply to residential development including but not limited to HN7 Housing size mix, HN8 Housing design and HN9 Accessible housing. BtR should not be conflated with alternative accommodation offers such as LSPBSL or hostel/houses in multiple occupation (HMO) development.

3.87 The covenant to secure BtR homes for the rental market for a minimum period of 15 years, together with a clawback agreement, should be secured through a Section 106 Agreement. During this period, private rented homes are retained in single ownership and overall ownership of the scheme can only change if the entire scheme remains as BtR. If individual homes are sold the covenant is broken and a clawback review is triggered. A valuation of the market and affordable homes is expected to be included within the Section 106 Agreement to enable the level of clawback to be calculated in the event the covenant is broken. Affordable homes proposed as part of any BtR scheme should also be secured via a Section 106 agreement.

3.88 Development proposals for BtR development are expected to carefully consider service charge costs at the design stage in accordance with policy HN8 Housing design. BtR development can come in various formats and providers should consider how affordability can be increased through offering differing levels of amenity or opting for lower maintenance provision to reduce expenditure.

3.89 Further information on BtR development is set out in the Mayor's London Plan guidance.

Rationale

This policy reflects a number of key considerations:

3.90 BtR will need to play an important role in London's housing market over the coming decade.

3.91 BtR is a type of conventional housing that addresses identified housing needs, providing greater choice for Londoners. Crucially, it also works to diversify sites and in turn speeds up their build out – helping deliver against identified housing targets. This is due to BtR's ability (as a rental product) to reduce a development's exposure to market absorption sales rates which limit the number of market homes that can be sold and slow the overall rate of site build out. BtR is expected to continue to play an important role in London's housing market over the coming decade.

HN7 Housing size mix

- **Policy aim:** 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
- **Applies to:** all applications for conventional residential accommodation
- **Locations:** all

Plan making

A Plan-making authorities should take into account local evidence of need, including that derived through local registers for social and intermediate housing, if preparing local policy or supplementary plans on housing size mix for affordable homes.

B Where an LPA wishes to prepare local policy or supplementary plans on housing size mix for market homes, this should be based on London's Strategic Housing Market Assessment.

Development management

C Development proposals should provide a range of unit sizes, determined through:

- (1) evidence set out in London's SHMA
- (2) guidance published by the plan-making authority in relation to housing size mix in affordable tenures, and
- (3) the contribution the scheme makes to ensuring a mixed, inclusive neighbourhood, having regard to the site's relationship to its surroundings, including transport connectivity, services, and the range and types of homes already present.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.92 Applicants, decision makers and plan-makers are expected to take a pragmatic approach to determine housing size mix, reflecting London's strategic evidence as well as the site's surrounding context described through the requirements set out in MBUL2 and set out in any accompanying design and access statement.

3.93 While London's strategic evidence should be relied upon to understand housing need overall and the approach to market housing, housing registers for affordable tenures (in offering a live picture of local need) provide a firm basis for any LPA producing supporting guidance and/or discussions over appropriate size mix with respect to affordable housing.

3.94 Town centres or highly accessible locations may better serve higher concentrations of smaller homes, but thought should still be given as to how family-sized homes can be incorporated into any scheme for best effect. In lower density areas, size mix may provide opportunities to redress any overconcentration of homes of the same size, introducing more choice into the local market.

Rationale

This policy reflects a number of key considerations:

3.95 London is a single housing market area and the majority of London's need lies in one and two bed homes that can more adequately provide for those wishing to form new households or downsize across London. The need for larger homes is significantly lower overall.

3.96 However, family-sized housing accounts for a much larger proportion of need in affordable tenures than in market homes. Boroughs (through their responsibility as the local housing authority) will hold key information on affordable housing need and can play a key role in addressing it through their allocations process. The focus in the policy is therefore on enabling local flexibility and variation with respect to affordable housing,

3.97 This does not apply with respect to market housing. With the need to optimise sites and deliver against high housing targets, and challenging viability, imposing extra local requirements would risk undermining viability and deliverability, without any clear basis in evidence.

HN8 Housing design

- **Policy aim:** to ensure that new residential development is of high-quality design and provides homes that meet Londoners' needs now and into the future
- **Applies to:** residential development
- **Locations:** all

Development management

A Residential development should meet the following criteria:

- (1) within the overarching aim of optimising site capacity and enabling the optimal orientation and layout of a proposal, housing development should maximise the provision of dual-aspect dwellings and seek to minimise the provision of single-aspect dwellings. Where single-aspect dwellings are proposed, it should be demonstrated that they will have adequate passive ventilation, daylight and privacy, and avoid overheating
- (2) all residential habitable rooms should receive natural light and have openable windows. This excludes the kitchen and/or dining room where they form part of an open-plan room that receives natural light. Where any fixed-shut windows are absolutely necessary for noise and pollution reasons, the residential unit should be provided with at least one habitable room that has openable windows
- (3) be tenure-blind to ensure that affordable housing units have the same external appearance as private housing. All housing entrances will need to be well integrated with the rest of the development and should be indistinguishable from each other
- (4) activate the ground-floor frontage by providing front doors with direct access to the street for ground-floor apartments and maisonettes
- (5) internal communal lobbies and circulation spaces should be designed to be welcoming, durable, well-lit and where possible naturally lit and ventilated

(6) incorporate at least 10 square metres of good-quality and accessible playspace per child. This provision should provide a stimulating environment for children of all ages and be safely accessible from the home by children and young people independently. Where feasible, landscaping should be designed to be playable.

B Private internal and outside spaces for individual dwellings should:

(1) meet the Nationally Described Space Standard (NDSS) that applies to all tenures and all residential accommodation that is self-contained (for M4(3) dwellings see requirements of policy HN9 Accessible housing)

(2) provide a minimum floor to ceiling height of at least 2.4m for at least 75 per cent of the gross internal area (GIA) of each dwelling.

(3) provide sufficient functional entrance space and storage.

(4) where there are no higher local standards in the borough Local Plan, provide a minimum of 5 sqm. of private outside space for 1-2 person dwellings and an extra 1 sqm. for each additional occupant. All of the minimum area provided must have a depth and width of at least 1.5m. This space does not count towards the minimum GIA space standards. Where feasible provide space for clothes drying.

C Communal outside amenity space provided in housing developments should:

(1) be overlooked by residential dwellings to enable passive surveillance

(2) not be segregated by tenure

(3) incorporate green space

(4) provide places to sit and relax with a comfortable level of wind and traffic noise

(5) where appropriate, provide opportunities for food growing.

D Where practical, family homes should predominantly be located on the lower six floors of tall residential buildings or have easy access to appropriate outside spaces provided on higher floors, to provide convenient access to, and overlooking of, outside play and amenity spaces.

E The long-term maintenance and servicing of the building, including the replacement of external components at height, should be addressed in the design of the building and choice of materials that will simplify the maintenance process and reduce future costs.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.98 When designing residential development, designers should consider the layout of individual buildings and the dwellings within them. Careful design can ensure that shared areas are a pleasant, inclusive and sociable extension to the home and help build supportive communities. Shared entrances should be safe, visible and

identifiable from the public realm while offering shelter to users. It is also important that there is sufficient space and storage in the home near the entrance (threshold space) to enable storage for items such as buggies, walkers and coats and a space to sit and put on shoes. The height of ceilings, doorways and other thresholds should support the creation of an inclusive environment and therefore be sufficiently high to not cause an obstruction. Engaging in early discussions with the Registered providers will help improve the design, integration and management of different tenures within the development.

3.99 The following should be taken into account when considering the provision, location and design of single-aspect dwellings in a development:

- single-aspect south-facing dwellings are most affected by solar gain/overheating while single-aspect north-facing dwellings can suffer from a lack of direct sunlight during the winter months
- dual-aspect can provide some mitigation when the dwellings face onto particularly noisy or polluted environments, by providing the option to open windows on a quieter side of the building
- increased ceiling height and/or having bay windows can optimise daylight and sunlight and allow buildings to be closer together than they might otherwise have been.

3.100 In determining comfortable levels of wind and traffic noise in outside communal spaces applicants are encouraged to use up to date wind and microclimate standards such as the Lawson Wind Comfort Criteria and the World Health Organization's (WHO's) Environmental Noise Guidelines.

3.101 The GLA provides a tool for estimating population yield from new housing development and an indication of the possible number and ages of children that could be expected to live in a new housing development of a given bedroom or tenure mix. Formal play provision should normally be made on-site and provide at least 10 square metres per child. This space may be provided on podiums where that is the most appropriate location for it. Where development is to be phased, there should be an early implementation of play space.

3.102 Off-site provision, including the creation of new play facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400m of the development and be accessible via a safe pedestrian route from children's homes. Schools, school playing fields and other facilities can also provide an important contribution to play and informal recreation facilities and should be encouraged to allow community access to facilities out of hours.

3.103 The design stage is crucial to the costs of maintenance and, as a result, for service charges for residents throughout the lifetime of the building. Where appropriate and practical, the following can be considered and implemented in the design of the development:

- design features that minimise ongoing cost to the residents, even though they may have a higher initial cost
- ensuring components and assets used in the development are of sufficient quality to ensure maximum lifespan for replacement and minimal repair costs
- balancing the number of residents who will benefit from a service with the cost of maintenance and replacement.

Rationale

This policy reflects a number of key considerations:

3.104 Good residential quality is not just a matter of comfort and safety; it is essential for maintaining both mental and physical health. This involves designing homes that cater to residents' lifestyles and degree of choice, as well as fostering a sense of comfort and belonging.

3.105 This Plan supports higher densities in appropriate locations to make the best use of land and accommodate more housing. The housing design requirements of this policy will be a vital means of ensuring that these new homes are of good quality, and fit for purpose and meet the needs of residents now and in the future.

3.106 Given the vast majority of new homes delivered over the Plan period will need to be flats, it is particularly important that shared indoor and outside spaces are well designed.

3.107 The overarching requirement to optimise sites and layout means that it is not always possible to deliver dual-aspect homes, but it is important – within these constraints – to maximise their provision given that they have many inherent benefits over single-aspect dwellings. These include better daylight, a greater chance of direct sunlight for longer periods, natural cross-ventilation, a greater capacity to address overheating, pollution mitigation, a choice of views, access to a quiet side of the building, greater flexibility in the use of rooms, and more potential for future adaptability by altering the use of rooms. Single-aspect dwellings are more difficult to ventilate naturally and can be more susceptible to overheating.

3.108 The requirements for minimum internal and private outside spaces and higher ceilings than the NDSS are particularly important in London given its dense urban environment, the predominant and unique flatted nature and higher density of new build housing provision. The minimum area and dimensions for the private outside space in the new policy are to ensure the space provided is functional and accessible. The minimum floor-to-ceiling height of 2.4m in new housing helps ensure they provide adequate quality, especially in terms of daylight penetration, ventilation and cooling, and sense of space. This context also means it is particularly important that shared indoor and outside spaces are well designed.

3.109 The level of service charges over time is of particular importance for affordable homes but it can also be a significant factor for leasehold flats.

HN9 Accessible housing

- **Policy aim:** to provide housing choice for those with accessibility requirements, including in different tenures
- **Applies to:** various types and sizes of residential development
- **Locations:** all

Development management

A Development proposals for residential development should:

- (1) provide at least 10 per cent affordable homes that meet Building Regulation requirement M4(3)(2)(b) 'wheelchair-accessible dwellings'
- (2) provide at least 10 per cent market homes that meet Building Regulation requirement M4(3)(2)(a) 'wheelchair adaptable dwellings'
- (3) ensure all other homes within the scheme meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'
- (4) apply M4(3) wheelchair user dwelling standards to all approach routes, including the vertical circulation in the common parts of blocks of flats.

B M4(3) homes within a scheme should:

- (1) be delivered across a range of housing sizes
- (2) be prioritised on the ground floor where possible, with provision on upper floors also supported where buildings have two or more lifts
- (3) meet the relevant minimum gross internal floor area set out in Table 3.8 and
- (4) in the case of homes not allocated by the local authority, make a demonstrable effort to ensure occupation by disabled persons – actively marketing to disabled people first, for at least four months prior to completion and at least two months post-completion.

C Development proposals should, where possible, meet the following noise performance levels 58 L'nT,w for maximum impact sound transmission in new build development and conversions to residential.

D Development proposals that result in a loss of wheelchair user homes should be resisted, unless they are replaced by at least the existing overall floorspace within the same tenure.

E All major non-self-contained residential accommodation should include:

- (1) wheelchair-accessible approach routes, entrances, circulation areas and communal areas
- (2) wheelchair-charging facilities
- (3) at least one wheelchair-accessible unisex toilet at entrance level in the waiting area of building/s and on all floors with communal areas.

F Development proposals for PBSA should provide at least:

- (1) 4 per cent (or one room, whichever is greater) wheelchair-accessible bedrooms
- (2) 1 per cent (or one room, whichever is greater) wheelchair-accessible bedrooms with a tracked hoist system and a connecting door to an adjoining (standard) bedroom
- (3) 5 per cent easily adaptable bedrooms for independent use.

G Wheelchair-accessible and/or adaptable student bedrooms should be delivered across a range of tenures and buildings and, where possible, be prioritised on the ground floor, with provision on upper floors also supported

where buildings have two or more lifts.

H Development proposals for LSPBSL developments should provide 10 per cent of units as wheelchair-accessible, and where possible be prioritised on the ground floor, with provision on upper floors also supported where buildings have two or more lifts.

I To meet accessible housing requirements in schemes of 36 homes or more, applicants should ensure the ongoing involvement of an access professional to support compliance from conception to completion and the design and access statements (DAS) should be approved by an access professional⁴⁸

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

Table 3.8: Minimum gross internal floor area for wheelchair-user (M4(3)) dwellings

Table 3.8: Minimum gross internal floor area for wheelchair-user (M4(3)) dwellings				
Type of dwelling	Type of dwelling	Minimum gross internal floor areas in square metres?	Minimum gross internal floor areas in square metres?	Minimum gross internal floor areas in square metres?
Number of bedrooms (b)	Number of beds (p)	1-storey dwellings	2-storey dwellings	3-storey dwellings
1b	1p	48	N/A	N/A
1b	2p	58	N/A	N/A
2b	3p	73	94	N/A
2b	4p	87	104	N/A
3b	4p	92	109	119
3b	5p	103	120	130
3b	6p	113	130	140
4b	5p	108	125	135
4b	6p	118	135	145
4b	7p	128	145	155
4b	8p	138	155	165
5b	6p	123	140	150
5b	7p	133	150	160
5b	8p	143	160	170
6b	7p		155	165
6b	8p		165	175

3.110 When calculating the proportion of wheelchair user homes required, figures should be rounded up to the nearest integer. It is expected that planning conditions will be used to secure M4(2), and M4(3)(2)(a) and

M4(3)(2)(b) dwellings by tenure. Planning conditions are expected to specify the:

- number and/or percentage of dwellings by tenure that should comply with Part M4(2)
- number and/or percentage of dwellings by tenure that should comply with Part M4(3)(2)(a) wheelchair adaptable standards
- number and/or percentage of dwellings by tenure that should comply with Part M4(3)(2)(b) wheelchair-accessible standards.

3.111 Each application for residential development will be expected to confirm the above information at both approval and completion stages. Information at completion stage should also be provided on the accessibility standard achieved per size typology (that is x number of y bed units) and by tenure.

3.112 In requiring at least 10 per cent of market homes to meet Building Regulation requirement M4(3)(2)(a) 'wheelchair-adaptable dwellings' this should be seen as a baseline requirement. It does not preclude provision of M4(3)(2)(b) 'wheelchair-accessible' market dwellings where a developer or applicant considers scope exists to do so (either as part of the 10% or in addition to it). Priority should be given to locating M4(3) wheelchair user dwellings on the ground floor as far as possible. Where there are two or more lifts, provision is supported throughout the building, including on higher floors. For buildings with only one lift, priority must be given to locating M4(3) on the ground floor wherever possible, however wheelchair user dwellings on lower floors (typically defined as floors 1 – 6) may be acceptable, with preference given to the lower of these floors.

3.113 As part of ensuring the occupation of M4(3) homes by disabled people, Section 106 agreements for new major residential developments are expected to include the marketing requirements set in policy. This may include information in all general marketing on the specific accessibility features of the M4(3) dwellings for all sales and lettings (first and subsequent). Marketing plans are expected to be approved by the LPA, prior to the commencement of marketing activities for the development or commencing superstructure works (whichever is sooner). A marketing compliance completion report is also expected to be approved by the LPA prior to homes being sold or let.

3.114 Private outdoor space should be provided in addition to the minimum gross internal floor areas set out in Table 3.8.

3.115 It is recognised that over time the definition of a 'wheelchair user home' has changed. However, where development proposals will result in homes being demolished, it is expected that the applicant will make a demonstrable effort to determine whether existing stock comprises wheelchair user dwellings and ensure replacement as part of any new build, providing information which justifies the approach through a planning application.

3.116 It is recognised that there may be some exceptional circumstances where this policy may need to be flexibly applied where it is not possible to achieve step-free access to a dwelling entrance, for example due to site constraints or limited/no scope to install a lift. These circumstances include, e.g. on upper floors, in blocks of four storeys or less; some small-scale infill developments; flats built above existing commercial units or garages; and stacked maisonettes where the potential for decked access to lifts is restricted.

3.117 The best practice levels set out in policy for maximum impact sound transmission, should be explored and met wherever possible. This expectation is for self-contained and non-self-contained accommodation.

3.118 It is expected that planning conditions will be used to secure noise levels set out in policy, and if achieved, will mean that post-completion testing is not required.

3.119 Figures 52 and 54 and 31 and 32 of the BS8300:2:2018-2 provide assistance to applicants in delivering wheelchair accessible student bedroom requirements.

3.120 LSPBSL wheelchair accessible units should meet Part M volume 2 of the Building Regulations and:

- include kitchenettes that meet Diagram 16 in Part M volume 2 of the Building Regulations; and
- have wheelchair accessible kitchen facilities on the same floor, meeting 19.1 of BS8300:2:2018-2 and containing at least one additional wheelchair accessible oven, positioned 1050 to 1080mm from finished floor level to the oven centre, with a pull-out shelf underneath, with 700 to 750mm clear knee space underneath.

3.121 The design and access statement is expected to:

- demonstrate how relevant engagement has been taken into account in accordance with MBUL8 Inclusive Design, part C(3);
- include floorplans demonstrating accessible layouts, and the gross internal floor areas of all units, including by dwelling type and number of bedrooms/bedspaces;
- consider relevant standards and good practice relating to accessible housing, such as that set out in 3.119; and
- explain how the same, or greater levels of access will be achieved, where alternative solutions are proposed.

3.122 To ensure that residential development proposals meet the accessible housing requirements set out within this policy, decision-makers may wish to secure through legal agreement the involvement of an access professional to support compliance.[49](#)

3.123 Publicly available management plans for all residential development secured by condition or legal obligation are encouraged.

3.124 All residential development is encouraged to meet standards and good practice, such as the BS8300:2:2018 Design of an accessible and inclusive built environment and Habinteg's 2024 Inclusive Housing Design Guide.

3.125 Accessible housing requirements may need to be balanced against other considerations, such as heritage or security. In achieving an appropriate balance, decision makers should consider barriers to access to and use of buildings, the advice of local authority officers and access professionals[50](#) and the views of local access groups.

3.126 All major residential developments are encouraged to complete a post-occupancy evaluation with occupants within 12 months of occupation to remove barriers, provide learning and improve design.

Rationale

This policy reflects a number of key considerations:

3.127 Ensuring housing choice for those with accessibility requirements is vital in meeting the needs of disabled and older Londoners and ensuring a genuinely inclusive city. This means supporting disabled Londoners housing needs to be met, through ensuring that adaptations are considered as part of the build – and

so improving disabled people's and carers' wellbeing, employment opportunities and spending power.

3.128 Notwithstanding the prioritisation of wheelchair user homes on the ground floor of development, in residential developments with two or more lifts provision of wheelchair user homes may be catered for across developments to ensure wheelchair users are afforded choice in their accommodation. However, the impact of lift failure, whether resulting from a power cut or mechanical fault, on the safety and welfare of disabled people who rely on lifts to access their homes should not be underestimated. It can also impact the ability to let M4(3) homes on upper floors.

3.129 By better matching provision to need, the approach should help optimise the use of land, since wheelchair user dwellings are larger on average than other dwellings, and it is more likely that they will be occupied by wheelchair users and other disabled people who need them.

3.130 Given London's predominance of higher-density and flatted development, and the proportion of Londoners experiencing social difficulties, improving the acoustics of new homes in London will help to meet the needs of neurodivergent Londoners, improving wellbeing and minimising health impacts. This will help to ensure that the Mayor meets the aims of the Public Sector Equality Duty.

HN10 Burial space

- **Policy aim:** to plan pro-actively for the expansion, re-use and long-term provision of burial space to meet future demand
- **Applies to:** all burial space proposals
- **Locations:** all, including Green Belt where applicable

Plan-making

A Plan-making authorities should plan pro-actively and collaboratively for the expansion, re-use, and long-term provision of burial space, recognising cultural and faith needs, by:

- (1) referring to the latest evidence, identifying existing capacities relative to needs (including cross-boundary)
- (2) applying a sequential approach to identifying new capacity, considering re-use and intensification within existing burial sites, other means of expanding such sites and then new sites within the existing urban area (whether inside or outside the borough) where compatible with environmental strategies and faith specific needs, before exploring Green Belt (preferably grey belt) options that are reasonably accessible to relevant communities, and
- (3) securing sufficient and appropriate burial provision through site allocations or agreements with other boroughs.

Development management

B Development proposals for new burial provision, or the expansion of existing sites and associated facilities required, should:

- (1) be supported in principle given the strategic need. This may include provision within one borough to meet the needs of faith groups from neighbouring boroughs experiencing burial space shortages
- (2) integrate with proposals for local green infrastructure enhancement and strategic GI opportunity areas where appropriate, and demonstrating compatibility with other environmental strategies, and
- (3) demonstrate that consideration has been given to future grave reuse and that this is reflected where appropriate in design and management strategies.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.131 The Audit of London Burial Provision (2026) should be regarded as up to date evidence for the boroughs covered by it. For those not covered by it, or for which there are data gaps, LPAs should produce equivalent evidence. This includes accounting for the needs of particular faith groups that require burials.

3.132 In identifying opportunities for additional provision, grave re-use should be considered⁵¹, starting with graves known to be more than 100 years old. There may also be other opportunities for intensification and expansion of existing sites. Design for re-use may include providing for double or even triple depth burials where ground conditions allow. Provision for re-use may also be reflected in management practices such as lease length and transparency regarding its potential. Faith-specific considerations may also apply, for instance, ensuring that any re-use is only for persons of the same faith. It may be more difficult to provide for faith-specific needs (e.g. regarding orientation to Mecca; and re-use only of graves within the same faith in re-use and intensification situations).

3.133 In considering these options, compatibility with environmental strategies (particularly those relating to nature recovery, green infrastructure, publicly accessible green space and the management of surface-water flood risk and water quality) should be carefully assessed. Strategies for managing the historic environment may also be relevant. Proposals for new provision should also reflect these considerations and opportunities for green infrastructure enhancement.

3.134 It is therefore expected that grey-belt and Green Belt sites will be needed in many cases, in which case policy PV7 applies. Accessibility is here defined by distance and journey time, most commonly by road. However, where assessing alternative site options, differences in accessibility may be evident, and a choice of means of access within reasonable journey time will always be preferable.

Rationale

This policy reflects a number of key considerations:

3.135 The Audit of London Burial Provision establishes a strategic need for burial space. It sets out the uneven distribution of burial space, the pressures on capacity, and the challenges in making more space available. The policy addresses these issues in the context of making best use of land, setting out how boroughs should use their

powers as burial authorities⁵², plan-makers and LPAs.

3.136 The policy seeks to ensure that boroughs plan pro-actively and collaboratively for the expansion, reuse, and long-term provision of burial space, recognising cultural and faith needs; and address strategic land shortages by considering burial provision within the Green Belt and other areas where appropriate. In doing so it recognises that burial spaces can form part of London's green infrastructure and historic environment and that this presents opportunities not just constraints. It also supports independent proposals where these align with the approach.

Navigation links

[< Chapter two](#)

[Chapter four >](#)

[Back to table of contents](#)

References

- [44](#)

For schemes on Green belt land – regardless of location band or land profile, Green belt threshold affordable housing requirement applies.

- [45](#)

For schemes on Green belt land – regardless of location band or land profile, Green belt threshold affordable housing requirement applies.

- [46](#)

[London Social and Affordable Homes Programme 2026 - 2036](#)

- [47](#)

For example [Supply and Demand for Supported Housing in London final report for GLA](#), Beatty, C.B. and Sanderson, E. CECSR, Sheffield Hallam University (2026); [Greater London Authority Mental Health Specialist and Supported Housing: Research & Market Development Project, Final Research Report](#), Imogen Blood and Associates; [London SHMA](#), GLA (2026)

- [48](#)

such as a housing Occupational Therapists?or access consultant?accredited by the National Register of Access Consultants.

- [49](#)

Such as a housing Occupational Therapist?or access consultant?accredited by the National Register of Access Consultants

- [50](#)

Such as a housing Occupational Therapist?or access consultant?accredited by the National Register of Access Consultants

- [51](#)

Section 74 of the 1972 Local Government Act provides the conditions in which human remains can be proactively disturbed to re-use and increase space. Additionally, the Local Authorities' Cemeteries Order 1977 provides the conditions for one or more burials in any single grave space and reclamation of abandoned graves (re-use) if rights are expired.

- [52](#)

Under the Local Government Act 1972 the London boroughs have the duty to provide and maintain cemeteries within and outside their areas, and in ensuring there is sufficient burial space for their borough requirements. The GLA is not a burial authority under this Act.