



Zoë Garbett AM
Chair of the Housing Committee

Sir Sadiq Khan
Mayor of London
(Sent by email)

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Towards a new London Plan, submission from the London Assembly Housing Committee

The publication of High-Level Document (HLD) 'Towards a new London Plan' in May 2025 kickstarted the next phase of work to deliver a new London Plan in 2027. It is described as setting out "key new ideas that the new plan might include for you to consider and comment on".

This is the submission of the London Assembly Housing Committee to the consultation. Over recent years the Housing Committee has published several reports, letters, and consultation responses of relevance to the next London Plan. This includes:

- [Worry and Stress: Life as a Leaseholder in London](#), report, June 2025
- [Breaking the Cycle: Housing Needs for Women Leaving Prison in London](#), report, May 2025
- [Building Community Power: Expanding Cooperative Housing & Community Land Trusts in London](#), report, May 2025
- [Response to the Plan of Action to end rough sleeping consultation](#), consultation response, December 2024
- [Affordable Housing Monitor](#), report, September 2024
- [London's Temporary Accommodation Emergency](#), report, March 2024
- [Young Londoners' Access to Home Ownership](#), report, March 2024
- [Affordable Housing Monitor](#), report, November 2023
- [Unsafe and unregulated: London's rogue supported housing providers](#), report, March 2023

- [Women and housing: a gap in the market](#), report, February 2023
- [Review of GLA Group Housing Delivery](#), letter to Mayor of London, 3 August 2022

Upcoming investigations:

- Accessible housing, letter expected July 2025

Over the course of these investigations, the Committee has set out many recommendations to the Mayor, to which the Committee would point the GLA London Plan team in their preparation of the new London Plan.

Under specific points in the Towards a new London Plan document, we have outlined relevant recent investigations and recommendations. We suggest that the GLA Planning Team consult the full corresponding report/consultation/letter in order to access the full body of evidence behind the recommendation.

2.13 Planning for affordable housing

The Towards a new London Plan document recognises the essential role of affordable housing, and states “a further step change is required to build the affordable and good quality homes London needs” and “the London Plan must continue to drive delivery of affordable housing”.

The Housing Committee is in full agreement that the London Plan must bring about a step change in unlocking and enabling affordable housing delivery. Affordable, and particularly social, housing is essential to the success of our city and to the quality of life of Londoners. We would also like to reinforce the Planning and Regeneration Committee’s recommendations around ensuring that housing is the priority land use within the London Plan.

London’s Temporary Accommodation Emergency, report

In this investigation we heard that in 2023, it was estimated that one in 50 Londoners are homeless and living in Temporary Accommodation (TA), including one in 23 children.¹ The report set out 16 recommendations, aiming to raise standards in TA but also reduce reliance on it. This included a key recommendation on increasing social housing supply, which underpins all our work as a Housing Committee:

- **The Mayor should continue to invest in the building and acquisition of new social homes, making use of government funding where available, to ensure that those unable to access secure housing in the private rented sector have a safe and sustainable route out of Temporary Accommodation.**

Key Worker Living Rent Homes consultation

In relation to intermediate housing, the Towards a new London Plan document states “The London Plan could build on work already done by the Mayor and introduce Key Worker Living Rent (based on key workers’ incomes) as a new tenure.”

¹ London Assembly Housing Committee, [London’s Temporary Accommodation Emergency](#), March 2024

The Committee submitted a response to the Key Worker Living Rent consultation which outlined our concerns about considering occupation alongside income in housing allocations, both in terms of burden on councils and in terms of equity of access for Londoners. However, the Committee recognised the Mayor's intention to take forward a Key Worker Living Rent Homes (KWLR) policy and shared several recommendations specific to the consultation questions in its submission.² In relation to the London Plan and the Mayor's decision around taking forward KWLR, the Committee would like to flag the following recommendation:

- **The Committee again recommends that a full analysis of the LLR programme is undertaken and published. The GLA and Committee should learn the lessons of the LLR programme, in order to best develop and implement KWLR.**

Young Londoners' Access to Home Ownership

This recommendation was reiterated from the Committee's Young Londoners' Access to Home Ownership investigation. This again looked at London Living Rent, recommending:

- **The Mayor should commission an evaluation, in 2024-25, of why housing providers are not providing more homes at the LLR tenure; and apply any learning to his plans for LLR tenures under the 2021-26 Affordable Housing Programme. The Mayor should also publish targets and delivery profiles for tenures under the 2021-26 Affordable Housing Programme.**

The Committee recommends that this review of London Living Rent is undertaken and published before the new London Plan commits to the implementation of Key Worker Living Rent homes.

2.16 Other housing options

Under point 2.16 Other housing options, the Towards a new London Plan document recognises that the "delivery of many types of more specialised housing has not kept pace with changes in London's population," and that "creating truly mixed and inclusive neighbourhoods enables everyone to meet their potential."

Building Community Power: Expanding Cooperative Housing & Community Land Trusts in London

Housing cooperatives and community land trusts offer real opportunities to help address London's housing crisis in ways that can complement more mainstream forms of housing. These forms of community-led housing can deliver homes that are both affordable and tailored for the needs of local communities.

² London Assembly Housing Committee, [Response to the Key Worker Living Rent Homes consultation](#), March 2025

The Committee believes that there is real opportunity to enhance the delivery of community led housing in London. As part of its investigation the Committee made several recommendations for increasing the delivery of community-led housing, with those most relevant to the London Plan being:

- **The Mayor should direct the further release of GLA Group land for housing cooperatives and community land trusts through the Mayor's Small Sites Small Builders programme. Continued effort in this area should identify new sites every year for the remainder of the Mayor's current term of office, with realistic targets for site and unit numbers to be defined by the GLA's Housing and Land directorate. Building Community Power: Expanding Cooperative Housing & Land Trusts in London - Housing Committee April 2025 - The directorate should conduct a review of the programme to ensure that housing cooperatives and community land trusts can benefit from it and any barriers to their participation removed, as far as possible. We expect this review to conclude, with new targets set and some potential new sites identified, by the end of 2025-26.**
- **The Mayor should direct GLA Group organisations to bring forward more opportunities for housing cooperatives and community land trusts to gain homes as part of wider developments on land they own. Continued effort in this area should identify new opportunities every year for the remainder of the Mayor's current term of office. All proposed developments should be subject to an assessment about whether they present a viable opportunity for allocations to housing cooperatives and community land trusts. We expect the GLA's Housing and Land directorate to be able to demonstrate that opportunities are being considered for new allocations, and that potential sites have been identified, by the end of 2025-26.**

Gypsy, Roma and traveller accommodation.

Policy H14 of the 2021 London Plan outlines policy recommendations to meet the needs of London's Gypsy, Roma and Traveller (GRT) community, including the requirement for a Gypsy and Traveller Accommodation Needs Assessment. In light of Sir Bob Kerslake's review (2022) looking at how to maximise affordable housing delivery on GLA Group land, the committee undertook a review of the proposals. A key recommendation was to ensure recommendation 12 [consolidation of small sites into a single programme] to include Gypsy, Roma and Traveller sites so that they can be delivered as part of a wider programme within a framework at both borough and London-wide level.

Since the London Plan's publication, boroughs and the GLA had a midpoint target (2008) outlining need per borough in the previous GTANA. Despite the policy being in place, progress in meeting these falls far below expectation and need; a key concern is the flawed methodology that undercounts given the use of the last census, resulting in inaccurate pitch requirements per

borough. The committee strongly believes that Policy H14 should in the new London Plan should:

- **Establish a model or methodology that accurately reflects cultural preferences around bricks and mortar vs living on a pitch, agreed with community experts.**
- **Any GTANA should better reflect overcrowding and how to address this, through an accurate count. This should engage community experts, going some way to address inaccuracies generated by use of census data**

2.17 Specialist and supported housing and housing London's older population

Under point 2.17 Specialist and supported housing and housing London's older population, the Towards a new London Plan document suggests that the London Plan could introduce a more strategic approach to meeting [supported and specialist] housing needs to ensure the right housing mix overall across London is delivered.

Breaking the Cycle: Housing Needs for Women Leaving Prison in London

This investigation looked at housing options for women leaving prison. We found that a chronic shortage of affordable and safe housing; local authority failures; and inconsistent practice across prisons, the London Probation Service and London Boroughs is creating a crisis for women leaving prison. We also heard that women leaving prison often have multiple and complex needs, including being survivors of domestic abuse. Many would benefit from specialist women-only supported accommodation, such as the Reconnect Plus programme run by Lewisham based housing association Housing for Women.³ We recommended:

- **Councils and housing associations in London should ringfence a proportion of their supported housing units for women released from prison. The Mayor should also engage with Government to secure revenue funding to expand the amount of supported housing for women leaving prison.**

Rough Sleeping Plan of Action, consultation response

As part of the Housing Committee's response to the Rough Sleeping Plan of Action, the Committee heard that there must be adequate supply of suitable housing, be it temporary accommodation, general needs, supported housing, or very specialist housing such as Housing First.⁴ As outlined above, there is demonstrable need for housing provision for women leaving prison, which is reflected in part in the Rough Sleeping Plan of Action. Guests recommended that the Mayor use his convening role to analyse provision of supported housing in London and

³ [Reconnect Plus](#), Housing for Women

⁴ [Housing First](#) is an approach to ending homelessness through housing and support provision. It prioritises access to permanent housing with tailored, open-ended, wraparound support for the resident that emphasises choice and control. It focuses on a specific group of people with histories of repeat homelessness, very complex needs, experience of multiple disadvantage and for whom other services have not been successful in ending their homelessness.

identify gaps. Guests also stressed flexibility is important when supporting people who have experienced rough sleeping, and support should not be restricted to local authority boundaries. The relevant recommendations are:

- **The Committee recommends that the Mayor should create a pan-London database of supported housing stock, provision and need, which can be broken down by client group.**
- **The Committee recommends that wherever possible, rough sleeping support in London is flexible and not restricted to local authority boundaries.**

Unsafe and unregulated: London's rogue supported housing providers

This investigation looked at the emergence of poor quality exempt accommodation in London. Some types of supported housing are 'exempt accommodation', meaning the usual caps of housing benefit, such as the benefit cap and the Local Housing Allowance (LHA) cap, do not apply.⁵ Exempt accommodation can be commissioned by a council, or 'non-commissioned', but still claim housing benefit from the council to cover their costs. This situation led to a rise in 'rogue' providers, delivering poor quality service but still able to charge the local authority for funds. During this investigation the Committee heard harrowing evidence about the conditions faced by some Londoners in poor quality exempt accommodation. The Committee set out 19 recommendations to the Mayor, with the following being most relevant to the London Plan:

- **The GLA's next Strategic Housing Market Assessment should estimate current and future housing need for all supported accommodation across London.**
- **The next London Plan should set targets for all forms of supported housing, as it does for older people's supported housing.**
- **The GLA should outline which groups it is referring to when it mentions, in the London Plan, that need may be best assessed and met on a multi-borough or pan-London basis. The GLA should consult with boroughs to identify demand for pan-London delivery, and begin work to establish this where there is demand.**
- **The GLA should create a pan-London database of supported housing stock, provision and need, which can be broken down by client group. This should then inform the GLA's supported housing delivery, by helping to identify where there are gaps in provision. The Committee recommends visualising this data in a map to improve accessibility.**

Women and housing: a gap in the market

⁵ London Assembly Housing Committee, [Unsafe and unregulated: London's rogue supported housing providers](#), March 2023

The women and housing investigation looked into the inequalities that women face in terms of accessing safe, secure and affordable housing. Once again, we heard about the challenges of a lack of suitable supported housing, and inconsistent practices across London boroughs. The report set out 13 recommendations, of which the following are particularly relevant to the Towards a new London Plan document:

- **Where possible, the Mayor should work with local authorities, charities and housing associations to increase the provision of women-only accommodation that is of high quality, particularly for women who have experienced domestic abuse, homelessness, are leaving prison, or who otherwise need specialist support. Other groups, such as LGBTQ+ people, young people and those leaving care, or those with low-level support needs, should also have their needs taken into account.**
- **The Mayor should work with local authorities to develop new standards to ensure consistency of service provision across London, and ensure that housing officers understand women's legal entitlements to housing, particularly relating to domestic abuse.**
- **The Mayor should work with local authorities to consider ringfencing a portion of accommodation for women with specific needs (including some women who may not otherwise meet priority needs' categories), including social, supported and temporary accommodation.**
- **The GLA planning team should prioritise safety as part of its London Plan Supplementary Planning Guidance on design. It should consult with Londoners, particularly women in London, on what design features would enable women to feel safer in their homes.**

Given these findings and recommendations across several investigations, the Committee would support a strategic pan-London approach to supported housing as outlined in the Towards a new London Plan document. We would also welcome more detailed analysis of supported housing need in the next Strategic Housing Market Assessment, which will underpin the London Plan.

4.5 Designing the homes we need.

Worry and Stress: Life as a Leaseholder in London

This investigation heard the experiences of over 700 Londoners who are leaseholders. We heard of the challenges facing leaseholders in London: high and increasing service charges, poor or zero service delivered for such charges, and a lack of transparency over charges. We also heard that one of the reasons service charges are so high, is because developers are not building good-quality buildings. We are concerned that without a stronger focus on the quality of the homes that we build, service charges will stay high. At the moment, where developments are built with poor-quality components that fail or need repair, leaseholders and social tenants foot

the bill.

The Committee set out 9 recommendations in its report, with one specifically aimed at the London Plan:

- **The Mayor should include ‘designing down service charges’ in his new London Plan. Developers should be required to submit to their local authorities steps they have taken to ensure maximum lifespan of building components and maximise whole-life value for money for leaseholders.**

The Committee recognises that ‘designing down service charges’ focuses on new builds. However, current leaseholders also need to see change. We heard about the challenge of shared owners who felt that service charges can undermine the affordability of their ‘affordable’ housing product. With that in mind we would like to also draw attention to a recommendation to the GLA around tracking of affordability within shared ownership delivered by GLA Investment Partners:

- **By the end of 2025, the GLA should amend the Service Charges Charter to state that investment partners should track affordability of shared ownership at specific intervals, such as years one, five, and 10. The GLA should work with housing providers to ensure that they have transparent, accessible policies for supporting shared owners whose housing costs have increased over 40 per cent of net household income. The GLA should collect data on affordability of shared ownership over time and use this to inform the next iteration of the product in the coming Affordable Homes Programme (AHP).**

Upcoming correspondence – accessible housing

The Committee recently held an evidence session on the topic of accessible housing. We look forward to sharing our findings on this important topic in due course. If you would like to discuss any of these recommendations further, please contact the Committee Clerk diane.richards@london.gov.uk who will arrange a meeting with the Chair.

Yours sincerely,

Zoë Garbett AM
Chair of the Housing Committee