# Holding the Mayor to account and investigating issues that matter to Londoners

## LONDONASSEMBLY

## Call for Evidence: Mid-rise development and the London Plan, September 2025

The London Assembly Planning and Regeneration Committee has launched an investigation into Mid-rise development and the London Plan.

This investigation will consider what role mid-rise residential development could play in meeting London's housing need, and how the next London Plan could support it. It will examine:

- The feasibility, public interest and appetite for mid-rise development and densification in London.
- The challenges and barriers to developing mid-rise residential buildings
- The Mayor's housebuilding targets for London and how mid-rise fits with this
- What policies the next London plan could include on mid-rise and density

Below is information about the investigation and Call for Evidence, as well as key questions the Committee is interested in hearing about.

#### Who can submit evidence?

This Call for Evidence is open to all who would like to respond. We particularly welcome responses from developers, councils, individuals with experience living in mid-rise developments, those who have submitted planning applications for mid-rise developments, and experts on urban density.

Why is the Committee exploring this topic?

The London Assembly investigates issues of importance to Londoners and is the body that holds the Mayor to account.

The Mayor is responsible for the London Plan, the spatial development strategy for Greater London that sets out a development framework for the next 20-25 years. The current London Plan was published in March 2021 and runs from 2019 to 2041. The GLA is currently drafting a new London Plan, which it intends to have adopted in 2027. It consulted on options and proposals for the next London Plan earlier in 2025 in *Towards a London Plan*.

Under the Government's most recent assessment of housing need, it has calculated that London will need to build 880,000 new homes over the next ten years. The next London Plan will need to address how and where these housing numbers are distributed across the whole of London.

Several organisations, including the Centre for London, have suggested that densification can play a big part in how London could meet its housing need.<sup>2</sup> LSE researchers note that a 2000 government paper found modern developments are typically built at much lower densities than the 35–40 dwellings per hectare common in many older suburbs, which were composed

<sup>&</sup>lt;sup>1</sup> GLA, London Plan 2021, p4, point 0.0.13

<sup>&</sup>lt;sup>2</sup> See, for example, Centre for London - <u>Gentle densification of suburbs could help meet London's</u> housing needs,

<sup>&</sup>lt;u>Density helps meet housing needs – and enhances environment, says Economist</u>, 27 January 2021

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of semi-detached and terraced houses with gardens, and also lower than current development densities in many other countries.<sup>3</sup>

Around 50 per cent of London dwellings are flats, including 9 per cent high-rise (6+ storeys) (EHS, 2017). More recent GLA analysis shows 42.5 per cent of stock is low-rise (2–5 storeys) and 11.7 per cent is high-rise, with no official figure for mid-rise.<sup>4</sup>

Recent data on residential development shows how London's housing densities compare with national averages and within different parts of the capital:

Area / Metric	Dwellings per hectare (dph)
England – new housing (2021–22)	31 dph <sup>5</sup>
London overall (2023) <sup>6</sup>	24.1 dph
Inner London	51 dph
Outer London <sup>7</sup>	17 dph
Central London (top quartile)	60 dph

Source: Compiled by Scrutiny

International comparisons highlight that London's overall population density is considerably lower than other major world cities such as New York and Paris:

<sup>3</sup> LSE Cities, <u>Density and Urban Neighbourhoods in London</u>, 2004, page 13

City	Population density <sup>8</sup> (people/km <sup>2</sup> )
London	4,542
New York	10,194
Paris	21,498

Source: Wired 9

#### **London Plan Policy**

<u>Design-led:</u> The current London Plan does not include a policy on mid-rise, nor does it prescribe specific densities of development. Policy D3 requires a design-led approach. Under this policy, boroughs must set appropriate densities through masterplans and frameworks, considering factors such as daylight, privacy, open space, and local context.

<u>Density Matrix history:</u> Previous iterations of the London Plan included a "Density Matrix". First introduced in the 2004 London Plan, this linked public transport accessibility and neighbourhood character to recommended ranges of dwellings per hectare. It remained in use until 2016, but by the 2021 London Plan was removed due to concerns that it had been applied inflexibly and used to justify poor design.<sup>10</sup>

<sup>&</sup>lt;sup>4</sup> London Assembly, Research Unit, <u>London's Housing Stock, November 2024</u>

<sup>&</sup>lt;sup>5</sup> Department for Levelling Up, Housing and Communities, <u>Land Use Change Statistics (New Residential Addresses)</u>: <u>England 2021–22, 27</u> October 2022

<sup>&</sup>lt;sup>6</sup> Greater London Authority, London's Housing Stock: Research Report, November 2024

<sup>&</sup>lt;sup>7</sup> Greater London Authority, London's Housing Stock: Research Report, November 2024

<sup>&</sup>lt;sup>8</sup> International density comparisons should be treated with caution, as Greater London's boundaries include extensive suburban areas, whereas other world cities are often reported at their denser core boundaries.

<sup>&</sup>lt;sup>9</sup> Wired, How to Fix London, 2023

 $<sup>^{10}</sup>$  Greater London Authority – <u>Draft London Plan – Topic Paper: Housing Density</u> (2017) pp2-3 — finds the matrix "not being followed" (only ~35 per cent of schemes within range; ~50 per cent above; ~15 per cent below) and says its "apparent numeric simplicity has led to it dominating the policy approach to density," justifying a shift away from the matrix.

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#### Will responses be published?

Yes, in the large majority of circumstances we will publish written submissions and the name of the individual or organisation that submitted it online. This is so that there is transparency about what evidence the Committee has received.

Exceptions to this are usually applied where there is a legal reason for non-publication or if there is a safeguarding or welfare issue. If there is a reason that you would like your evidence not to be published with your name (submitted anonymously) or to not be published (submitted confidentially), please let us know and the Committee will consider it. However, this cannot be guaranteed, and the Assembly may be required to release non-personally identifiable information if requested under the Freedom of Information Act 2000.

#### What will the evidence I provide be used for?

The responses to this Call for Evidence may be used to inform recommendations to the Mayor, which will likely be in a report. These will be held as open meetings, and anyone is welcome to attend as an audience member to watch the discussion on the <u>Assembly webcasts page</u>.

If information and/or quotations from submissions to this call for evidence are used in this output, we will cite you. We inform those who have submitted evidence about the outcome of the investigation in the form of a link to a report or output when it is published.

#### Where can I find your privacy notice?

The London Assembly and the GLA are committed to protecting your privacy and personal data when you contact us or submit evidence. You can find the GLA's privacy notice <a href="here">here</a>.

#### Do I need to answer all the questions?

No, you are welcome to answer the questions that are most relevant to you or your organisations and for which you have the most expertise or experience.

#### How do I submit evidence?

Please send evidence in a Word document format (not PDF) by email to: <a href="mailto:scrutiny@london.gov.uk">scrutiny@london.gov.uk</a>

The deadline for submission is 10 November 2025.

#### **Key questions**

- 1. What approaches to housing density would best serve London's future needs?
  - a. Should housing density targets and approaches be considered differently in inner and outer London?
  - b. Should housing density targets and approaches be considered differently in town centres?
  - c. What would be a suitable default definition of mid-rise?

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- d. If so (to previous two questions), what principles should guide density in each, and how might mid-rise housing play a role?
- 2. Should London build more mid-rise housing? Why / why not?

What are the social, economic, and environmental impacts of mid-rise housing compared to low-rise and high-rise forms of development?

- a. How does the experience of quality of life (e.g. access to services, sense of community, green space, affordability) vary for residents of mid-rise, low-rise, and high-rise housing?
- b. How can mid-rise housing meet the needs of families, and how does this compare with other forms of housing?
- c. How should mid-rise developments be integrated into existing areas?
- 3. How could mid-rise housing contribute to meeting London's housing needs?
  - a. Are there examples (in London or internationally) where mid-rise housing has struck the right balance between density, liveability, and affordability—and what can London learn from these?
  - b. What role could upward extensions or airspace development play in increasing housing supply in London, and how might mid-rise typologies be adapted to support this?
- 4. What design, planning, or regulatory barriers currently prevent delivery of well-designed mid-rise housing in London?

- a. What aspects of planning policy, guidance, or decision-making most constrain the delivery of mid-rise housing?
- b. What role could design codes play in enabling more and betterquality mid-rise housing in London?
- 5. How does London's rate of mid-rise housing construction compare to other cities, and what factors contribute to any differences?
  - a. What factors make London's context different from other cities, and how should its unique history be taken into account when comparing mid-rise delivery?
- 6. How feasible is it to add additional storeys to existing low-rise housing?
  - a. If so, under what conditions would this be practical?
  - b. What would be the (planning, financial, and social) challenges of densifying low-rise areas into mid-rise?
- 7. What role should the GLA, and the new London Plan play in supporting mid-rise housing development?
  - a. The London Plan's density matrix was removed in 2021. What can be learned from its use, and are there lessons for how future policy should guide mid-rise housing delivery?
- 8. Looking ahead, what opportunities and challenges does mid-rise housing present for London over the next decade, and what would success look like?

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#### **About the Committee**

The Planning and Regeneration Committee holds main responsibility for examining the London Plan, the **London Legacy Development Corporation** (LLDC) and the **Old Oak and Park Royal Development Corporation** (OPDC). Read more about our previous work.

#### **Committee Members**

- James Small-Edwards (Chair) (Labour)
- Andrew Boff (Deputy Chair) (Conservative)
- Sem Moema (Labour)
- Elly Baker (Labour)
- Zoë Garbett (Green)
- Shaun Bailey (Conservative)

#### Contact

Submissions	Scrutiny@london.gov.uk
	Please send your submissions in a Word document format (not PDF) by 10 November 2025.