

LONDONASSEMBLY

November, 2025

Planning and Regeneration Committee

This document contains the written evidence received by the Committee in response to its Call for Evidence, which formed part of its investigation into mid-rise development and the London Plan

Calls for Evidence are open to anyone to respond to. In September 2025 the Committee published a number of questions related to its investigation, which can be found on page 2. The Call for Evidence was open from 29 September to 10 November 2025

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Questions asked by the Committee

Copy and paste questions included in the CfE here so it's clear what organisations were asked about.

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?
 - 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 better quality 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?

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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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Dr Liam Thomas Bolton Ref No. MID001

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

Dr Liam Thomas Bolton

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?

Antony and Roderick House in Bermondsey, London, is an exemplar of mid-rise housing and airspace development. Two storeys and 30 affordable homes were added to Antony and Roderick House, a mid-century block of flats, in 2024. The use of modern methods of construction such as modular units streamlined the construction process and reduced disruption to existing residents. The design of the new structures works well with the context, adding to the existing building's aesthetic. Antony and Roderick House combines affordability with high-quality density design and innovations in construction and engineering.

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?

Upward extensions, or airspace development, can play a notable role in increasing housing supply in London. As an alternative to demolition and sprawl, it is considered to be a sustainable form of densification that makes use of existing resources. My doctoral research, completed at The Bartlett School of Architecture at UCL, provided an analysis of airspace development in London. Using new data and mapping techniques, it explored the historical and future landscape around airspace development in the capital. My research found that upward extensions were increasingly being deployed as a method of increasing the supply of new housing and of densifying the capital. There are a range of examples of upward extensions being added to mid-rise housing in London. Multi-storey extensions, which tend to involve the construction of more new homes, gained ground over time, particularly on modern buildings and non-residential buildings. While an upward trend in the completion of upward extensions broadly occurred in outer London, the trend

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in inner London was downward. However, there is significant potential to build more rooftop homes in Greater London. As a way of incrementally increasing housing supply and achieving sustainable densification, airspace development should be a more important element of the London Plan. We can learn from innovative initiatives that have been implemented in boroughs like Newham and Wandsworth.

Although a case-by-case analysis is required, there are several ways that mid-rise typologies could be adapted for airspace development. Mid-rise typologies are often highly adaptive. The structural engineering of the existing building could be adapted to support extra loading. Airspace development could be combined with upgrades to the existing building, which can have the added effect of increasing the value of property. By upgrading poor-quality roofs, for instance, airspace development could contribute to reductions in heat loss, improving energy efficiency. Using modern methods of construction, rooftop units could potentially be built off-site. Modular units could then be craned-in. This could also improve the viability of affordable airspace development on mid-rise housing. These suggestions, some of which incorporate new innovations in design, engineering and construction, are applicable to mid-rise typologies and could ultimately support efforts to increase housing supply in London.

6. How feasible is it to add additional storeys to existing low-rise housing?

a. If so, under what conditions would this be practical?

Airspace development on low-rise housing is feasible under several conditions. There are many examples of upward extensions on low-rise housing in London. In order to assess feasibility, a case-by-case analysis of the existing context is required. The feasibility of airspace development is strongly determined by the existing building's adaptivity. The existing building must be able to support extra loading. If necessary, it should have the capacity to be upgraded internally. The surrounding area - including, but not limited to, existing infrastructure - should be able to support any increase in density brought about by airspace development. The design of new extensions is a significant factor. In some areas, particularly those that have been designated as historic or architecturally-significant, contextual extensions are often more appropriate. Design codes can provide guidance, supporting high-quality extensions. The policy context has a significant impact on the feasibility of airspace development. Permitted Development Rights have streamlined some aspects of the planning system, although they have

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been criticised for resulting in a swathe of poor-quality homes. Airspace development could be better incorporated in the London Plan. Some boroughs have already launched policies and initiatives that aim to support upward extensions on low-rise housing. These could be scaled and adapted to other parts of London. New extensions should have a limited effect on easements, which can play a significant role in low-rise areas. Airspace development should aim to have a minimal impact on residents. There are several examples of existing residents being prioritised for new rooftop homes in London. The use of modern methods of construction such as modular units could streamline the construction process and reduce disruption.

b. What would be the (planning, financial, and social) challenges of densifying low-rise areas into mid-rise?

Densifying low-rise areas into mid-rise presents several challenges. It requires an in-depth understanding of the context and any associated design, planning, engineering challenges as well as financial and socio-economic factors. Airspace development is characterised by its complexity and its relationship with the context. Going mid-rise can represent a significant change for some buildings and areas. This can pose a range of planning challenges. From rights to light to air rights, airspace development can have a significant impact on the planning context. Density design must always acknowledge the impact on the existing context. The engineering context can constrain airspace development. Some typologies are structurally unsuitable for airspace development, meaning they would not be able to support the extra loading associated with new extensions. Increasing densities can result in a range of socio-economic problems. Densification can lead to overcrowding, for example, and strains on services and infrastructure. Design-led densification that adds to the context is important. Although modern methods of construction have improved feasibility, airspace development may be impractical from a financial perspective. It is essential that the barriers to high-quality, sustainable densification via airspace development are addressed.

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?

The Density Matrix was removed on several grounds. It was based on a subjective scoring system. There was subsequently a lack of adherence to the Density Matrix's targets and it was not implemented in some local authorities.

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It was inconsistent in terms of how it established permissible densities in different areas. In some instances it provided density guidance that was too broad or inappropriate for a given area. The Density Matrix was also based on a limited range of parameters and measures. As a result, it often failed to account for the complex nature of densification. The London Plan should emphasise the importance of design-led densification. Although my research finds that there is room for new quantitative measures of density to be implemented, future policies should be design-led and evidence-based. New measures that have been tailored to mid-rise housing typologies and areas could be incorporated. In order to make better decisions, we need better measures as well as high-quality data on density.

Related Argent Limited Ref No. MID002

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

General comment:

It is our view that a design-led approach remains the appropriate approach (as is currently the position under the London Plan). Arguably, there is no need for a policy on mid-rise, as mid-rise is achievable through a design-led approach, however, stronger support for and encouragement of higher densities (including mid-rise) is key to addressing housing need and delivery. In our view it is important that there is positive support for mid-rise development within the London Plan as part of the solution to achieving more densification. The London Plan is a strategic document, hence it is suggested that it simply provides positive strategic support for mid-rise (and, as is already noted within 'Towards a New London Plan', increased density): more detail can be introduced, if appropriate, at borough level.

It is important that in making planning decisions, in weighing the numerous planning factors, the need to deliver more housing and hence the need for higher density housing, is taken into account. That means that mid-rise (and high-density typologies) should be supported (in a similar way to support for a broader range of residential typologies). One of the challenges of delivering more density may be contextual or surrounding density, i.e. existing low-rise, low-density can suggest new proposals should reflect such typologies, however, there are many examples across London where higher densities and mid-rise have been delivered successfully alongside lower rise existing homes, such as, the emerging Brent Cross Town. Brent Cross Town is a good example of design-led, mid-rise development being delivered next to existing lower rise housing in a suburban context.

Brent Cross Town, a mixed-use regeneration, although still in the early stages of development demonstrates delivery of a variety of mid-rise buildings, designed by different architects, whilst all sharing a common approach to quality and design principles. The emerging result is a well-considered new town, providing homes to a multigenerational community. Related Argent's development at Tottenham Hale takes a similar approach but is higher density. The fundamental principles of a well-

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designed and executed collection of buildings remains the same, but a higher density was appropriate in this location.

The effect of any support for and/or policy on mid-rise will very much depend on the proposed wording. We would therefore be grateful to have the opportunity to comment further as the draft London Plan and any relevant supporting document emerges. In addition, as the next London Plan will run from 2027, it is suggested that there should be clarity on these issues in this interim period.

Key Questions raised by the call for evidence:

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?

The approach should be more nuanced. Some outer London boroughs are appropriate for higher density, including mid-rise with potential for clusters of taller buildings.

b. Should housing density targets and approaches be considered differently in town centres? Yes, a key driver for density will be transport accessibility and access to amenities.

c. What would be a suitable default definition of mid-rise? It should not be prescriptive (and will depend on any changes to the definition of tall building).

2. *Should London build more mid-rise housing?* Yes, it should.

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? Designed well, each category is capable of delivering a high quality of life for residents. Proximity to green space, public realm and amenities is important for successful communities across all densities. Boroughs should consider how new schemes can contribute to their existing context, assuming not all developments come forward as part of a masterplan where public realm design is controlled by the same developer.

b. How can mid-rise housing meet the needs of families, and how does this compare with other forms of housing? Our experience, including at King's Cross, tells us that families are happy to live in mid-rise and high-rise housing, provided they live in well-designed accommodation that considers their needs (e.g. storage space etc.) and there are amenities to cater for their wider needs (e.g. child care, green space etc.).

c. How should mid-rise developments be integrated into existing areas? This is the benefit of having a positively supportive strategic policy, indicating that it is possible to successfully deliver mid-rise even where the surrounding is low rise (if there is transport accessibility etc.).

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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? As noted above, generally current planning policy does not in theory constrain mid-rise, but nor does it encourage it. Support could include ensuring that the need for increased density must be included in the planning balance.

Although outside the planning regime and so not to be addressed through the London Plan, a major implication for mid-rise densification is likely to be the Building Safety Act, which has resulted in proposals purposefully either staying under the 18m (6-storey) threshold or pushing for much taller buildings.

The London View Management Framework (LVMF) is being reviewed as part of the London Plan review – any such revision should consider implications for wider densification, including mid-rise.

b. What role could design codes play in enabling more and better quality mid-rise housing in London? Design codes can be too prescriptive and are certainly not appropriate within the London Plan (a strategic document).

Related Argent Limited, 10th November 2025