



James Small-Edwards AM
Chair of the Planning and Regeneration Committee

Sir Sadiq Khan
Lord Khan of Tooting
Mayor of London

(Sent by email)

22 September 2026

Dear Sir Sadiq,

Upwards extensions

As you have recognised, most recently through the emergency housebuilding measures announced in March 2026¹, London's housing crisis is the single greatest challenge it faces today. At its root, this is a crisis borne out of a need for more – high-quality, social and affordable – homes.²

The Planning and Regeneration Committee has taken a keen interest in scrutinising how this challenge can be addressed. Following our previous investigation into the role that mid-rise development could play in increasing housing delivery³, we wanted to revisit the issue of intensification via upwards extensions to explore what more can be done to deliver it at the scale needed. Accordingly, we held a meeting on 8 July with industry professionals and London boroughs to explore the extent to which upward extensions can contribute to meeting London's housing needs, and to assess any barriers affecting their delivery.⁴ We are writing to share our findings and

¹ Ministry of Housing, Communities and Local Government, [Emergency action to kickstart London housebuilding](#), 25 March 2026

² London Assembly Planning & Regeneration Committee, [Unlocking development in London](#), March 2025, p.9

³ London Assembly Planning & Regeneration Committee, [Between skyscrapers and semis: London's missing mid-rise housing](#), March 2026

⁴ London Assembly Planning & Regeneration Committee, [Agenda and draft minutes - Upwards Extensions in London](#), 8 July 2026

recommendations with you from this meeting. With the GLA currently developing the London Small Site Design Code LPG, we hope that these findings will help to inform the potential contribution of small sites towards London's housing delivery.

Revisiting historic practices to create new homes

Historically, parts of London have grown upwards by extending their existing building stock. This practice has created some of what Claire Brady, of Historic England, described to us as London's best places to live with "some of the highest density residential accommodation that we have".⁵

In recent years, there has been renewed interest in this form of upward development. Nationally, updates to the National Planning Policy Framework (NPPF) in 2023⁶ and reforms to permitted development rights in 2020⁷ have sought to encourage it. In London, Policy H2 of the London Plan similarly supports the incremental intensification of existing residential areas through upward extensions.⁸

Given the scale of current housing need, Michael Holland, Deputy Chief Executive Officer of Newham's wholly owned housing developer Populo Living, told us "As a sector, we need to be pulling all levers to try to address the housing pressures that we have."⁹

Potential from upwards extensions

In our meeting, we heard from guests on the assessments that have been carried out into how many new homes these recent national policy changes could deliver in London. These estimates ranged from a theoretical, technically feasible, upper limit of half a million homes through to a more modest 140,000 homes.¹⁰ Guests also emphasised how important it was to factor in that such extensions not only create new homes, but also add bedrooms.¹¹

Yet, delivery has been comparatively low. We heard several factors have contributed to this, chief among them heightened risk and uncertainty. Dr Charles Gillot, whose doctoral thesis examined upwards extensions, explained to the Committee:

"[T]he main barrier that came out again and again in this was uncertainty. That would be technical uncertainty, uncertainty surrounding, "Can the engineer find the reserve capacity

⁵ [\(Public Pack\)Minutes - Appendix 1 - Transcript of Panel 1 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p. 17

⁶ See para 125 (e) [National Planning Policy Framework](#) (2024)

⁷ [Town and Country Planning \(General Permitted Development\) \(England\) \(Amendment\) \(No. 2\) Order 2020](#)

⁸ See para 4.2.4- 4.2.6 [London Plan 2021](#)

⁹ [\(Public Pack\)Minutes - Appendix 2 - Transcript of Panel 2 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p. 3

¹⁰ Dr Riëtte Oosthuizen (Partner - Planning, HTA Design), Nicholas Boys-Smith and Dr Charles Gillott (Senior Sustainability Engineer, WSP UK & Ireland) all offered estimates. See pp. 1-4 [\(Public Pack\)Minutes - Appendix 1 - Transcript of Panel 1 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#),

¹¹ [\(Public Pack\)Minutes - Appendix 1 - Transcript of Panel 1 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), pp. 3-4

within this building? Can structural engineers sign this off?” but more than that, financial and economic uncertainty. Will I get a return on investment for this vertical extension?”¹²

Since the reforms to permitted development were enacted, there have also been major – yet necessary – changes to fire regulations post-Grenfell. These have only added to the technical and financial challenges associated with delivering upward extensions.¹³

De-risking by design code

Several London boroughs have taken steps to de-risk this kind of development. In our meeting, we heard evidence from guests representing two of those boroughs (Tower Hamlets and Haringey) about the successes and challenges in implementing such a design code. Michael Ritchie, Place Shaping manager at Tower Hamlets, told the Committee the design codes developed had created certainty for residents, “so that they know that if they meet the conditions of the design code, they will get consent for their mansard roof extension.”¹⁴ This he said has allowed the borough “to preserve and maintain character” of the conservation area whilst empowering local residents “to extend their homes, which allows them to stay in the borough and continue to contribute to the community.”¹⁵

While neither borough had been able to quantitatively assess the results of the policy changes, both agreed that there had been a net positive effect. Richard Truscott, Principal Design Officer, London Borough of Haringey, spoke about how the design code had responded to specific local demand for extending homes. He told us that “The sense is that it has been popular. You can certainly see a lot of extensions. The vast majority of them have done really well. We have certainly had reports back that people who are really happy.”¹⁶

Opportunities to London to grow upwards

After our meeting, the draft London Plan was published for consultation. This provides encouragement for boroughs to develop “strategies, design guides, design codes and/or masterplans that set clear expectations on scale, height, and form of development (and other parameters as relevant) for areas where a more pro-active approach is required to promote development.”¹⁷

The Draft London Small Sites Design Code guidance¹⁸, published for consultation on 11 September, provides an opportunity to establish a more consistent approach that gives boroughs greater

¹² [\(Public Pack\)Minutes – Appendix 1 – Transcript of Panel 1 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p.15

¹³ [\(Public Pack\)Minutes – Appendix 2 – Transcript of Panel 2 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p.6

¹⁴ [\(Public Pack\)Minutes – Appendix 2 – Transcript of Panel 2 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p.1

¹⁵ [\(Public Pack\)Minutes – Appendix 2 – Transcript of Panel 2 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p.1

¹⁶ [\(Public Pack\)Minutes – Appendix 2 – Transcript of Panel 2 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p.10

¹⁷ See [Policy MBUL2: Optimising the use of land and site capacity](#) in draft London Plan, 16 July 2026

¹⁸ GLA. (2026). [London Small Site Design Code LPG consultation](#)

confidence to support well-designed intensification, provided that there is good local consultation and support for such changes. We heard that outside conservation areas, character area pattern books and design codes could provide a clear framework for sensitively accommodating upwards extensions while respecting the distinctive qualities of London's historic neighbourhoods.¹⁹

Any London-wide approach should combine support with clear expectations. Nicholas Boys-Smith described to the Committee an approach he categorised as “carrot and stick”.²⁰ In this approach, he said boroughs should be encouraged and supported to develop locally tailored pattern books and design codes. But, that where authorities do not produce local guidance within a reasonable timeframe, the GLA should then apply a London-wide default pattern book that has been designed to reflect common historic building typologies and can be adapted where needed.²¹ The recently published Draft London Small Sites Design Code guidance aims to provide “a baseline for plan-making and decision making in the absence of a locally adopted small site design code”.²²

Providing boroughs with the opportunity to develop their own guidance, while offering a default framework that boroughs could choose to adopt, would encourage local leadership whilst avoiding any unnecessary delays to the delivery of well-designed homes.

Recommendation 1: The GLA should develop a pattern book/code for upwards extensions which boroughs could either fully accept, adapt or create their own bespoke version, which should take place within a 12-month period. Designs should be subject to good local consultation and support.

While much of the opportunity lies in smaller-scale, incremental development, larger projects should not be overlooked. The Committee heard that planning is not necessarily the principal barrier to delivering upwards extensions at scale. Ash Bhatti, of Apex airspace development, suggested that if the Mayor wishes to see significantly more delivery of this type, some form of pump-priming would be needed to build market confidence and unlock projects.²³

The draft London Plan identifies a target of delivering 558,000 homes by 2037 as the level considered realistically achievable over the next decade. It also recognises that meeting the Government's ambition of 850,000 homes will require additional investment, policy changes and delivery mechanisms over the longer term.²⁴

Upwards extensions could form part of that longer-term strategy. The Committee therefore encourages the GLA to use the next ten years to reduce barriers to delivery by providing greater

¹⁹ [\(Public Pack\)Minutes - Appendix 1 - Transcript of Panel 1 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p.15

²⁰ [\(Public Pack\)Minutes - Appendix 1 - Transcript of Panel 1 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p.23

²¹ [\(Public Pack\)Minutes - Appendix 1 - Transcript of Panel 1 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p.23

²² GLA. (2026). [London Small Site Design Code LPG consultation](#)

²³ [\(Public Pack\)Minutes - Appendix 2 - Transcript of Panel 2 Minutes Supplement for Planning and Regeneration Committee, 08/07/2026 14:00](#), p.8

²⁴ GLA, [Draft London Plan](#), July 2026

policy certainty, supporting standardised approaches where appropriate and locally supported, and helping to build investor confidence, so that upwards extensions can make a more meaningful contribution to London's housing supply in the decades ahead.

The Committee would welcome a response to this letter by 3 November 2026. Please send your response by email to the Committee's Clerk, Lauren Harvey (lauren.harvey@london.gov.uk).

Yours,

A handwritten signature in dark ink, appearing to be 'JSE', with a large, sweeping loop on the left side.

James Small-Edwards AM

Chair of the Planning and Regeneration Committee