



The Lord Bailey of Paddington AM Chairman of the Housing Committee

The Lord Khan of Tooting
(Sent by email)

15 October 2026

Dear Lord Khan,

I am writing to share the Housing Committee's response to the Draft London Plan consultation. The Committee held a meeting on 2 September 2026 to gather evidence on some of the key housing measures in the Draft Plan. At this meeting, we heard from three borough leaders¹, the Deputy Mayor for Planning, Regeneration and the Fire Service and GLA officials. I am pleased to set out our findings in this letter.

Meeting the housing targets in the Draft London Plan

The Draft London Plan sets a target of delivering 558,000 new homes over the next ten years, broken down by local authority.² We asked the borough leaders at our meeting whether they were supportive of the housing targets set for their boroughs, whether they felt these targets were realistic and how they intended to meet them.

Cllr Stephen Cowan, Leader of Hammersmith & Fulham, was supportive of setting housing targets, calling them a "call to arms" and "essential".³ Mayor Jason Perry, Mayor of Croydon, when asked about the GLA's assessed need in the Strategic Housing Market Assessment (SHMA) for 43,800 market homes across London, said that "you have to aspire and have something to aim for."⁴

However, they also argued that the targets in the Draft London Plan are reliant upon changes to the policy landscape and the housing market. Cllr Cowan stated that "the targets are viable, if there are policy changes", noting "a huge skills and labour shortage that has been particularly exaggerated since Brexit" and that "there is not much building going on across the country", which impacts

¹ The Committee heard from Cllr Stephen Cowan, Leader of Hammersmith and Fulham Council and Chair of London Councils; Mayor Jason Perry, Mayor of Croydon and Executive Member for Planning, Infrastructure and Regeneration, London Councils; and Mayor Liam Shrivastava, Mayor of Lewisham and Executive Member for Community Safety, Cohesion and Neighbourhoods, London Councils.

² GLA, [Draft London Plan 2026: HN1 Increasing London's housing stock](#), July 2026

³ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 1, 8

⁴ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 8

London as a “particular challenge”.⁵ Mayor Liam Shrivastava, Mayor of Lewisham, told us that “from a Lewisham perspective, we think [the targets are] realistic, but only if we are given the tools to deliver,” emphasising the importance of new transport infrastructure.⁶

Deputy Mayor Jules Pipe made similar observations to the Committee, telling us:

“I would say it requires three things to make it a plausible number: a turn in the economy, much higher levels of affordable housing investment – despite the fact that we currently have the highest affordable grant pot that London has ever received, it would need to be several times bigger – and sustained investment in public transport over that period.”⁷

The Deputy Mayor reiterated these points to the London Assembly Plenary meeting on 10 September. He explained that the targets are “theoretically plausible”, but only in the event of “a significant upturn in the economy”, “sustained investment in transport upgrades and some expansion in the form of metroisation”, and “a significant increase in affordable housing grant”.⁸

The Committee has different views on the targets proposed, but we welcome the need to be ambitious in the face of London’s enormous housing need, while recognising that construction started on just 5,547 private-sector homes in 2025 and 9,366 GLA-supported affordable homes in 2025-26, well below the proposed annual target of 55,800 homes a year. The housebuilding sector has experienced unprecedented challenges in recent years, including a rise in construction costs, skills shortages, high interest rates and new building safety regulations. On top of this, the sector is experiencing demand-side challenges. As Cllr Cowan noted at our meeting, “developers find it very difficult to build. Once they are building, they then find it quite difficult to sell in some cases.”⁹

“A significant upturn in the economy” to improve viability conditions in the housing sector and for interest rates to come down may take longer than desired and is contingent on numerous complex factors. The need for “a significant increase in affordable housing grant” is a huge consideration in the delivery of the proposed targets, particularly affordable housing. While the Government has already outlined funding plans for the Social and Affordable Homes Programme 2026-36, we await to see if the Government’s renewed focus on council housing delivery will lead to increased grant funding in future iterations of the Affordable Homes Programme.

While we recognise that the housing targets in the draft London Plan are contingent on significant changes to current market conditions and the policy landscape, including grant funding, we acknowledge their ambition and echo the comments made by the Council Leaders at our meeting. We do believe, however, that Plan should be clearer that the success of these targets ultimately depends on national funding, affordable housing grant, borrowing flexibility for local authorities, infrastructure investment, transport delivery and market conditions.

Working with boroughs

It is essential that the GLA works closely with London’s boroughs in the design and delivery of the London Plan. We were disappointed to hear that many boroughs received limited notice of their housing targets, with some only hearing from the GLA the night before publication.

Cllr Cowan, who is also Chair of London Councils, explained that “if there is a criticism from some of my colleagues, not necessarily the same party as me, but some people have said they got told the

⁵ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 8

⁶ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 2

⁷ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 2](#), 2 September 2026, p. 1

⁸ London Assembly Plenary, [Draft London Plan](#), 10 September 2026, p. 3

⁹ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 4

targets very late in the day, sometimes the night before.”¹⁰ Mayor Perry, who is also London Councils’ Executive Member for Planning, Infrastructure and Regeneration, told us that “a common theme is that a lot of the numbers were passed through to boroughs very late in the day.”¹¹ Mayor Shrivastava added that “[Lewisham] also received our targets very late in the day, just before.”¹²

It was concerning that the Draft London Plan included the wrong housing targets for some boroughs based on incorrect borough boundaries, and later had to be corrected, indicative of a need for greater collaboration between the GLA and local authorities in preparing the Plan.

Cllr Cowan went on to say:

“The way we have to rise to the challenges of this age is to do it very collegiately. The complexity of this city requires that. I would urge the officials in the Greater London Authority (GLA) who were telling people the night before that there might be a more workman-like way to do that, which might get better results.”¹³

We agree that the GLA must work hand-in-hand with London’s boroughs when finalising the London Plan. The boroughs will ultimately be responsible for ensuring London’s development is in line with the Plan, and they understand the needs and the conditions on the ground in their local areas. Cllr Cowan noted that “there needs to be a conversation with all three levels of Government to hit the [housing] targets.”¹⁴ As Mayor Shrivastava told us, council leaders “know [their] boroughs inside out”¹⁵, and the GLA must draw on this local insight when developing the London Plan. We therefore endorse the comments of the Council Leaders and call on the GLA to work more collaboratively and closely with local authorities in all stages of the process.

Building on the Green Belt

The Draft London Plan includes a London-wide target of 56,100 homes to be built on the Green Belt.¹⁶ At our meeting, we heard from Mayor Jason Perry from Croydon, a borough which has a target of 5,600 homes on greenfield sites. Mayor Perry explained that Croydon’s annual housing target has gone up by just four per cent per year compared to the current London Plan, despite the significant number of homes proposed for the Green Belt. He therefore argued that Croydon did not need to build on the Green Belt in order to reach its housing targets.

He told the Committee:

“In Croydon’s case, what we have seen is the numbers of our large sites have essentially been reduced and that has just been pushed into the Green Belt. I cannot see any justification as to why that is the case in Croydon. We have always delivered on large sites. We have always delivered on small sites and brownfield sites. That is what we have done for many, many years. That is what we plan to do for the future. There is no need to go into the Green Belt.”¹⁷

The Committee is concerned about the imposition of Green Belt housing targets from extremely ambitious overall housing targets and without adequate consultation with boroughs and without due

¹⁰ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 7

¹¹ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 9

¹² London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 9

¹³ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 7

¹⁴ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 2](#), 2 September 2026, p. 8

¹⁵ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 9

¹⁶ GLA, [Draft London Plan 2026: HN1 Increasing London’s housing stock](#), July 2026

¹⁷ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 6

consideration of alternative brownfield sites. It is imperative that the GLA works with boroughs before designating housing targets in their areas. There may be cases – as Mayor Perry argued – where boroughs can meet housing targets without encroaching onto the Green Belt. Given the Draft Plan’s ‘brownfield first’ approach, the GLA should consult with all boroughs with greenfield housing targets to explore whether housing need can instead be met on brownfield sites.¹⁸

Housing size

Policy HN7 Housing size mix of the Draft Plan states that “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.”¹⁹ It also states that “family-sized housing accounts for a much larger proportion of need in affordable tenures than in market homes.”²⁰ At our meeting, Lucinda Turner, Assistant Director for Planning and Regeneration at the GLA added that “11 per cent of the overall need, in the evidence, is for social rent family homes.”²¹

The borough leaders we heard from said they would like to see a greater emphasis in the London Plan on family-sized homes. Mayor Perry said that “we would like to see more three bedroom-plus homes. That is where our demand is.”²² Mayor Shrivastava explained:

“Thinking about the fact that we have so many families in TA [Temporary Accommodation] and we have so many families on the housing register, there is often a distinct lack of family homes that we are seeing come through, three beds and four beds. With the Draft Plan, it is saying that any local policy that we set for size mix, for market homes, should be based on the SHMA and that heavily skews towards building one and two beds.”²³

The Committee has repeatedly argued that London needs more family-sized homes of all tenures. We are concerned that the conclusions drawn by the SHMA, that London is predominantly in need of one and two bed homes, is contingent on complex considerations of under-occupancy and potential down-sizing, and that the data does not therefore provide us with the level of detail needed to ascertain overall housing size need. We are therefore concerned that the SHMA underestimates the need for larger homes in London, a view seemingly shared by the council leaders who understand where the need is in their local areas.

We therefore recommend a more strategic approach at borough level to avoid predominantly building one and two bedroom homes which may exacerbate existing conditions, while recognising that grant restrictions so far have made it more difficult to build larger homes in London. Any change in approach would therefore also have to consider grant conditions, in order to provide local authorities with the means to deliver family sized homes more effectively.

¹⁸ Sem Moema AM, Elly Baker AM, and Leonie Cooper AM do not endorse this section and support the mixture of housing targets as laid out in the draft London Plan, with a 502,351 target for brownfield sites and a 56,100 target for Green Belt sites, i.e. nearly 90 per cent of the overall target on brownfield sites and nearly 10 per cent of the overall target on Green Belt sites

¹⁹ GLA, [Draft London Plan 2026: HN7 Housing size mix](#), July 2026

²⁰ GLA, [Draft London Plan 2026: HN7 Housing size mix](#), July 2026

²¹ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 2](#), 2 September 2026, p. 10

²² London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 13

²³ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 11

Affordable housing

The Draft London Plan establishes three affordable housing thresholds of 20 per cent, 25 per cent and 35 per cent, with different thresholds applying in different boroughs on the basis of local viability and development costs.²⁴ Planning applications can follow the ‘fast-track route’ without the need for a viability assessment, if they meet the affordable housing requirement in the relevant borough. The three leaders at our meeting represented boroughs with three different affordable housing thresholds.

It is important to clarify that the geographic bandings only refer to the Mayoral Fast Track, not overall affordable housing targets, and only developments seeking to apply for the Mayoral Fast Track are captured by the 20, 25, 35 per cent thresholds. However, these thresholds are often seen in practice as targets by decision makers at borough and GLA level.

We did not receive extensive evidence on the benefits or drawbacks of having three different thresholds. However, Mayor Shrivastava highlighted the differences in land values in different parts of Lewisham, and argued that setting a single threshold for the whole borough “seems like a bit of an arbitrary measure.”²⁵ He pointed out that a neighbouring borough, Lambeth, has a higher proposed affordable housing threshold, despite having similar housing targets and a similar level of need.²⁶

Speaking about the threshold approach, Lucinda Turner told us that “we knew we wanted to amend that approach [of having a single threshold throughout London], but we did also have to be cognisant of overly complex approaches whereby developers were having to deal with different rates within the same borough.”²⁷

We therefore encourage the GLA to continue to work with boroughs going ahead to ensure differences in land values and local complexities are taken into account.

Yours,



The Lord Bailey of Paddington AM
Chairman of the Housing Committee

²⁴ GLA, [Draft London Plan 2026: HN3 Delivering affordable housing](#), July 2026

²⁵ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 3

²⁶ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 1](#), 2 September 2026, p. 3

²⁷ London Assembly Housing Committee, [Draft London Plan 2026 – Panel 2](#), 2 September 2026, p. 13