

The Planning Team
Greater London Authority
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14 January 2026

Dear Sir / Madam

Re : Consultation on the Proposed GLA Support for Housebuilding

Please find below the response of the Land, Planning and Development Federation (LPDF) to the current GLA consultation on Support for Housebuilding.

The LPDF is a trade body representing land promoters, housebuilders (of all sizes), and commercial developers. Our members take on significant financial risk in navigating the planning system to establish the principle of development, unlocking land for new homes, employment space and infrastructure that supports thriving communities across the country. The LPDF encourages its members to deliver well-designed, high-quality, sustainable places that deliver a mix of housing types and tenures, commercial spaces, and community uses that have a positive social, environmental, and economic impact.

As a consequence of our members' daily interactions with Local Planning Authorities (LPAs) and consultees throughout the country, the LPDF is uniquely placed to comment on the operation of both the plan making and decision taking components of our planning system. It has been estimated that the land promotion sector is responsible for over half of the outline planning consents for residential development on an annual basis.



Question 1: Are the proposed changes to the cycle parking standards, in conjunction with the wider package proposed by this consultation, likely to make a material difference to the viability of residential schemes while still providing sufficient cycle parking to enable sustainable growth in London and mode shift?

The LPDF do not consider that the proposed changes to cycle parking standards will make a meaningful difference to the viability of schemes. The levels would have to be reduced even further if they are to ensure that the space saved from the provision of cycle parking, could be utilised for the provision of further homes or commercial space.

Question 2: Do you consider that the guidance on flexibility and quality in sections 2.3 and 2.4 of the guidance will address development viability and cycle parking quality challenges?

Yes.

Question 3: The GLA welcomes views on the proposed changes to the housing design standards.

The LPDF supports the removal of standards as set out in the consultation document. This will help with the flexible design of schemes, so as to maximise delivery and ensure the efficient use of land.

Question 4: The GLA welcomes views on the time-limited planning route. Do you agree that this will support the early delivery of housing development whilst also maximising affordable housing provision in the short term? Are there any changes to the approach that would more effectively achieve these objectives?

The LPDF welcomes the new time-limited planning route and support the application of this to existing schemes where at least 20% affordable housing is provided. This will help some sites which have stalled because of viability, to be brought forward.

However, the stipulation that 60% of the affordable housing provision be for social rent may be a barrier to the delivery of new homes. Developers are facing increasing difficulty getting Registered Providers (RPs) to acquire S106 affordable homes, as the mix of tenures agreed with LPAs often do not match the requirement of the RPs.

Question 5: Do you agree with the proposed eligibility criteria for the time limited planning route? The GLA welcomes any views on whether this will, and how this better can, help to achieve the objective of increasing housing supply and supporting early delivery whilst also maximising affordable housing provision in the short term.

The LPDF support the new time-limited planning route, but we consider that the approach should also be available for schemes proposed on Green Belt and Metropolitan Open Land (MOL).



Whilst the development of brownfield land in London faces significant viability challenges, the scale of the housing need in London for both family and affordable housing, makes it inevitable that greenfield land, Green Belt land and potentially Metropolitan Open Land (MOL) will be required to be released to meet the need.

London is in the grips of a critical housing crisis as the capital has consistently under-delivered against its housing targets. This crisis has been exacerbated over the last 18 months with the viability concerns which have led to a significant reduction in the level of starts on sites, with just over 7,000 homes started in 2024/25. Completions have averaged below 40,000 units per annum and this has to be set against an annual London Plan target of 52,000 homes per annum and 88,000 homes per annum under the new standard method.

If London is serious about tackling its housing crisis and helping the Government to deliver on its ambition for 1.5 million new homes across the parliament, then it needs to commit to delivery from all possible sources, not just rely on estate renewal, brownfield land and small sites. A strategic review of Green Belt and MOL is a necessity.

Therefore, the time-limited planning route should also be made available to schemes on Green Belt and MOL so that they can contribute significantly to meeting the stretching target for housing across London.

Question 6: Do you agree that the proposed approach to grant will help to achieve the objective of increasing housing supply and supporting early delivery, whilst also maximising affordable housing provision in the short term? To what extent will this help to support the acquisition of affordable homes secured through the planning process by Register Providers?

The LPDF supports the approach to grant funding proposed in the consultation, as we consider that this will help support the acquisition of S106 affordable housing by RPs.

Question 7: The GLA welcomes views on the approach to reviews under the time limited route, including whether any further criteria should be applied which would a) incentivise early delivery, or b) help to ensure that, if reviews are triggered, additional affordable housing contributions are provided where viability improves over the lifetime of the development.

The LPDF do not wish to comment on this question.

Question 8: Recognising that the substantial implementation milestone of the first floor set out in 4.6.1 may not be appropriate in all instances, are there any circumstances in which an alternative review milestone to completion of the first floor would be necessary and justified, in a way that continues to incentivise fast build out?

The LPDF do not wish to comment on this question.



Question 9: An alternative approach for phased schemes would be for boroughs, and the Mayor for referable applications, to have discretion to agree forward dates and milestones for future phases if it would support the faster build out of the scheme, which if met mean that no review is required for that phase. Do you agree with this and what measures would be required to ensure that this resulted in faster build out than may otherwise be the case?

The LPDF do not wish to comment on this question.

Question 10: The GLA welcomes views on any additional measures that would support the delivery of schemes with existing planning consents which provide 35 per cent or more affordable housing. Do you agree that the time limited planning route would support schemes which have been granted planning consent but are currently stalled?

To assist further with the delivery of social housing, relief should be allowed on additionality without this being subject to LPA discretion.

In addition, in order for these proposals to have maximum impact, developers, RPs and LPAs should be able to negotiate over the correct tenure split for the affordable housing for each site, dependent upon local circumstances.

Question 11: Are there any further measures that would help to prevent the level of affordable housing being reduced in consented schemes where this is not needed to enable the development to progress?

The LPDF do not wish to add anything additional in relation to this question.

