



London's Emergency Housing Package – GLA

G15 Response

January 2026

About the G15

The G15 is made up of London's leading housing associations. The G15's members provide more than 880,000 homes across the country, including around one in ten homes for Londoners. The G15 represents the largest providers of new affordable homes in London and accounts for approximately 15% of all affordable homes built across England. Over the last few years, our members have funded and delivered more than 56,000 new homes in partnership with the Mayor of London. Delivering good quality safe homes for our residents is our number one priority. Last year our members invested almost £2bn in improvement works and repairs to people's homes, ensuring people can live well. Together, we are the largest providers of new affordable homes in London and a significant proportion of all affordable homes across England. It's what we were set up to do and what we're committed to achieving. We are independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents.

Find out more and see our latest updates on our website: www.g15.london

The G15 members are:

- A2Dominion
- Clarion Housing Group
- The Guinness Partnership
- Hyde
- L&Q
- MTVH
- Sovereign Network Group
- Notting Hill Genesis
- Peabody
- Riverside
- Southern Housing

For more information, please contact: G15@Peabody.org.uk

The G15 welcomes the Greater London Authority (GLA) taking targeted action to address London's specific housing challenges, working in collaboration with central government. Housing need continues to rise across the capital, with demand for social and genuinely affordable rented homes far outstripping supply. Delivery has slowed sharply in recent years, driven by persistently high build costs, viability pressures, and, for housing associations, financial demands linked to building safety, increased investment in existing homes and decarbonisation. A London-specific package, coordinated locally and aligned with national intervention, is therefore both necessary and timely.

Members welcome the proposed targeted adjustments to design measures, particularly in relation to cycle storage, which offer a pragmatic response to current viability pressures and provide an opportunity to reinforce the flexibilities that are often agreed in partnership discussions, including dual aspect and CORE considerations, rather than introducing new requirements, while still maintaining overall quality and adaptability of homes. However, for some members, such flexibilities are already being permitted on new schemes, and therefore, while we would of course support them being introduced across the board, such changes may not shift the dial.

As outlined in the group's [response to the London Plan consultation](#) in June 2025, we recognise the value of strong design standards in supporting sustainability, quality, and long-term liveability. We are committed to creating thriving and sustainable communities across London. However, as we highlighted previously, it is not always viable to deliver developments that achieve suitable levels of density, high thresholds of affordable housing, and meet all new sustainability requirements simultaneously, particularly in the current market context.

As long-term stewards of the homes we build, G15 members will continue to prioritise well-designed, durable and adaptable homes that support residents' wellbeing and stand the test of time. There is a particular risk that reduced standards could be embedded through Section 106 negotiations, even where registered providers would prefer to maintain higher specifications. It is therefore essential that the application of these flexibilities is carefully managed, targeted at genuine viability constraints, and implemented in a way that does not compromise overall design quality or create a lower baseline across the capital. This is critical to ensuring that short-term delivery pressures do not undermine long-term outcomes for residents and they continue to benefit from homes that are safe, functional, and supportive of wellbeing.

Clarity on how policies sit together remains important if emergency measures are to deliver their intended outcomes. Where these measures are introduced, it should be clear how they operate alongside the London Plan and local plans. Better alignment across the policy framework would help give applicants the confidence to bring forward

schemes in line with the policy intent. In particular, clearer signals are needed where boroughs apply a different approach, including how City Hall may use its call-in powers and the weight that would be given to emergency guidance. This certainty is essential to ensure that policy flexibilities translate into timely decision-making, rather than remaining theoretical while schemes are delayed or refused at the local level.

Members support the new time-limited planning process and agree this is key for ensuring sites are not unnecessarily delayed. However, while planning flexibility is important, it cannot substitute for adequate and sustained grant funding. The uplift in grant rates is welcome and provides additional support, but it is unlikely to fully offset the ongoing cost pressures and financial risks faced by housing associations in London. We recommend that the GLA continues to review grant levels and other complementary actions to ensure that emergency planning measures deliver meaningful increases in social and affordable homes without placing undue financial strain on housing association balance sheets and weaken long-term financial resilience.

Along with the allocation of grant, greater flexibility over the use of Recycled Capital Grant Fund (RCGF) is essential. As emergency measures have been introduced to provide additional flexibility elsewhere in the system, it would make sense for registered providers to be afforded equivalent tools to support delivery. We recommend allowing RCGF to be used alongside grant, as this would materially improve scheme viability and help unlock stalled sites, including schemes affected by contractor insolvency or abnormal cost pressures. In addition, greater flexibility to deploy RCGF alongside building safety and decarbonisation funding would free up balance sheet capacity for new development, even where those funding streams relate to existing homes.

The work already undertaken by the GLA and London Councils on stalled sites is key and welcomed. Greater flexibility and fast-tracked planning routes should help more of these sites move into delivery, and we look forward to continuing to work with GLA teams on how best to unlock progress at pace.

We also note the concurrent consultation being run by MHCLG on related proposals. [Our response](#) highlights the wider package of reforms needed to support the delivery of the right homes in the capital. This includes rent convergence set at an appropriate level, a targeted low-interest loan package, reforms to the Section 106 system, and measures to address weak housing market demand, such as widening eligibility for shared ownership by increasing the household income cap. While these issues lie largely outside the scope of this consultation, they are fundamental to the overall effectiveness of the emergency package and its ability to deliver meaningful increases in the supply of affordable housing.

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?

Yes.

Changes to cycle parking standards have the potential to improve the viability of residential schemes, while continuing to support sustainable travel and modal shift, particularly where they reduce the need for costly and inefficient forms of provision.

Our experience shows that current London Plan minimum cycle parking standards can result in over-provision. Furthermore, cycle parking is frequently located in basements, undercrofts, or upper floors, often requiring lifts, additional circulation space, and complex construction solutions. These measures add substantial cost, increase embodied carbon through additional excavation and concrete-intensive structures, and can displace homes or other critical uses in high-value areas. Therefore, we welcome the principle of reducing minimum cycle parking standards and adopting a borough-based approach informed by transport accessibility.

Members do, however, note that the proposed reductions are modest and time-limited, meaning they are unlikely to materially shift scheme viability in many cases. That said, we support a decisive shift from minimum standards towards fixed, evidence-based requirements that provide certainty and remove scope for upward negotiation during the planning process. Early certainty on cycle parking requirements is critical to efficient design, layout and floor space allocation, particularly at the initial design stage. Treating revised standards as a baseline from which boroughs can request additional provision risks undermining the benefits of reform and reintroducing delay and viability risk.

The quality and usability of cycle stores is as important as quantity. External stores are not always viable due to security concerns and competing pressures on amenity space, play space, or areas required to deliver Biodiversity Net Gain. On one major London scheme, 1,183 cycle parking spaces are being delivered for 651 homes, occupying around 1,200 square metres of net internal area – equivalent to the floor space of 17 three-bedroom homes. Several individual stores are comparable in size to studio or one-bedroom units. This illustrates the scale of opportunity costs associated with current standards.

We strongly recommend that any revised cycle parking standards are embedded in the next iteration of the London Plan and reviewed through the standard plan cycle, informed by usage data and changing travel patterns. Combined with the wider package of measures in this consultation, more proportionate and predictable cycle parking

standards would improve scheme viability while maintaining support for sustainable growth and mode shift across London.

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?

Members appreciate the intent behind sections 2.3 and 2.4 of the guidance. But as we stated in our [response](#) to the 'Towards a New London Plan' consultation, there needs to be a broader review of cycle parking standards and the London Cycling Design Standards to better reflect deliverability and real-world use.

Section 2.3 provides helpful clarification on the types of cycle parking that may count towards minimum long stay requirements. However, in practice these options are not measures that G15 members would typically seek to rely on, and as such are unlikely to make a material difference to the viability challenges associated with meeting cycle parking standards on constrained sites.

We particularly welcome the acknowledgement in section 2.3.4 that, in certain circumstances, it may be appropriate to provide less than the minimum cycle parking standards. To ensure this flexibility has a meaningful impact, it will be important for the GLA and TfL to apply it proactively and consistently, supporting developers where justified departures are proposed. We also suggest that the reference to avoiding basements as a justification for reduced provision should be expanded to include podium structures, which can similarly add significant cost and complexity and materially affect scheme viability.

Moreover, while the overall direction of section 2.3 is welcome, section 2.4 continues to place significant weight on compliance with TfL's London Cycling Design Standards, which can be challenging to achieve on many sites. This can undermine the flexibility introduced elsewhere in the guidance. We therefore do not consider that sections 2.3 and 2.4, taken together, will fully resolve development viability or cycle parking quality challenges.

A further step that could support delivery is allowing local authorities to secure cycle storage details by condition where sufficient space is demonstrably available. This would reduce the need to negotiate fine details during the planning process and could accelerate decision-making.

Overall, the guidance is a step in the right direction, and we would strongly encourage the GLA and TfL to embed this flexible, pragmatic approach in the next London Plan and to go further in addressing the disproportionate cost and space impacts that current cycle parking standards can have on residential delivery, particularly on high-density and brownfield sites.

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

We support the proposed changes to the housing design standards, particularly the removal of Standard C4.1 on dual aspect dwellings and Standard B2.5 on homes per core. Removing these standards permanently, rather than on a time-limited basis, provides much-needed clarity for design teams and developers and aligns with national planning policy by supporting efficient land use.

G15 has consistently raised concerns about the impact of the dual aspect requirement on cost, efficiency and deliverability. In practice, achieving very high proportions of dual aspect homes can increase wall areas, constrain layouts and reduce net internal space, particularly on constrained urban sites. It has rarely been feasible to deliver schemes with 100 per cent dual aspect homes, and formal removal of this requirement better reflects development realities in London and can have a positive impact on scheme viability.

Members recognise the importance of achieving good internal environmental quality, including adequate ventilation and mitigation of overheating risk, particularly in the context of a warming climate. However, dual aspect is not the only, or always the most effective, means of achieving these outcomes. High-quality single aspect homes can perform well when supported by strong fabric standards, passive design measures, appropriate orientation, shading, ventilation strategies and compliance with Building Regulations. In some cases, approaches such as Passivhaus or similar fabric-first standards can deliver better thermal comfort, energy efficiency and value for money than mandating dual aspect layouts alone. We therefore support a policy approach that focuses on performance-based outcomes rather than prescriptive design requirements, encouraging dual aspect provision where it is achievable and appropriate, but allowing flexibility where alternative design solutions can deliver equivalent or better results. This approach supports scheme viability and delivery while still safeguarding resident comfort, wellbeing and long-term sustainability.

We also welcome the removal of the homes per core limit, which can act as a constraint on efficient design and density optimisation. Greater flexibility in this area allows layouts to be optimised for both cost and delivery, unlocking additional homes on suitable sites without compromising quality.

Overall, we consider the proposed changes to strike a more pragmatic balance between quality, sustainability and deliverability. We support this direction of travel, provided that design standards continue to ensure environmental performance and resident wellbeing, including proportionate safeguards against overheating, inadequate ventilation or reduced accessibility.

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?

We agree that a time limited planning route has the potential to support earlier housing delivery in the short term, while maintaining the overall ambition of the London Plan for affordable housing provision.

We support the threshold approach to affordable housing set out in section 4.1 of the consultation document, as it provides clarity and certainty on the GLA's expectations. This can help streamline pre-application discussions and embed affordable housing requirements into land values, supporting viability and the acquisition of stalled schemes by housing associations. However, the Fast Track Route still requires a late-stage viability review, which in practice could extend section 106 negotiations and undermine the objective of speeding up delivery.

The proposed time limited route allows lower levels of affordable housing delivery, 20 per cent on private land compared to the London Plan target of 35 per cent, without the need for upfront viability assessments where eligibility criteria are met. The ability for housing associations to access grant funding for the additional affordable homes delivered above the planning consent threshold is particularly important, as this improves acquisition viability and encourages delivery on stalled sites.

We agree with the gain share review mechanism being in place where construction has not reached a defined milestone by March 2030, and support the flexibilities outlined in regard to the Building Safety Regulator Gateway process.

While the proposal may make affordable housing delivery more attractive in the short term for providers with sufficient capacity to work within the proposed grant rates, recent scheme viability assessments that some members have undertaken indicate that the grant rates currently tabled are not sufficient to address increased development costs. Further measures, such as greater flexibility in the use and retention of Recycled Capital Grant Fund (RCGF) alongside the AHP and other grant streams, will be necessary to fully support land-led delivery by housing associations. If not addressed, this is likely to constrain delivery capacity, and limit the extent to which the policy can achieve its stated objectives.

Overall, we support the intent of the time limited route as a short-term intervention to address viability pressures and stimulate development, provided it remains genuinely time limited, targeted at schemes with clear viability constraints, and does not dilute the long-term commitment to delivering at least 35 per cent affordable housing across the London Plan period.

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

We broadly agree with the proposed eligibility criteria for the time-limited planning route, as set out in section 4.4, and recognise that they provide a clear and consistent framework for schemes to come forward quickly.

Members strongly support the prioritisation of Social Rent as the most genuinely affordable tenure and as central to the London Plan's long-term objectives. The requirement for at least 60 per cent of affordable housing to be delivered as Social Rent appropriately reflects this ambition and should remain the default position. However, given the specific and time-limited purpose of this route, which is to unlock stalled schemes and accelerate delivery in the short term, there may be limited circumstances where a small degree of flexibility on tenure mix could help address acute viability constraints without undermining overall affordable housing outcomes. Any such flexibility should be exceptional, clearly justified, and demonstrably linked to earlier delivery, rather than used to dilute policy expectations.

Where applied, this flexibility should be explicitly time-limited and tightly controlled, with the expectation that schemes revert to standard London Plan tenure requirements outside this intervention. This would ensure that the policy supports immediate delivery pressures while safeguarding the central role of Social Rent in meeting London's long-term housing need.

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?

In principle, we welcome the proposed use of benchmark grant rates, which provide greater upfront clarity and certainty for both developers and Registered Providers. This approach has the potential to speed up grant negotiations and reduce delays associated with protracted discussions on funding assumptions.

However, our recent scheme viability assessments indicate that the grant rates tabled are not adequate to reflect current development costs. As a result, Registered Provider capacity is still likely to be constrained, particularly in the context of competing demands and record levels of investment in resident's homes.

Subject to this concern, we support (in principle) the ability to access grant on affordable homes above the first 10 per cent of affordable provision. This represents an

improvement on other GLA grant programmes that apply higher thresholds. We also welcome the ability to access grant for affordable homes secured through the planning process outside of 100 per cent affordable developments, which should help support delivery on mixed tenure schemes, provided grant levels are sufficient to make acquisitions viable.

In relation to the acquisition of Section 106 affordable homes, we echo the concerns set out in section 4.5.6 of the consultation document regarding persistent design, quality and specification issues experienced by Registered Providers. These issues continue to undermine the viability and long-term management of Section 106 homes and can limit RP appetite and ability to acquire them. We reiterate support for the measures set out in the [G15 Guidance for Developers on Section 106](#), which emphasise early engagement with Registered Providers, clearer expectations around design and specification, and greater collaboration throughout the development process. Aligning the proposed grant approach with these principles would strengthen the effectiveness of the policy and better support the acquisition of Section 106 affordable homes, helping to maximise delivery in the short term while safeguarding quality.

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.

G15 members typically deliver schemes that are compliant with, or exceed, adopted London Plan affordable housing policy. As a result, members have limited experience of operating within viability-tested or review-based planning routes, and do not routinely engage with late stage or contingent review mechanisms in the way that volume housebuilders and speculative developers do.

That said, G15 supports the principle that review mechanisms should be clear, proportionate and predictable. They should incentivise timely delivery without introducing uncertainty or delay where schemes are progressing in line with agreed delivery programmes and affordable housing commitments.

We also support the proposed flexibility where slow build out is attributable to factors outside a developer's control, including delays in securing decisions from the Building Safety Regulator, given the well-documented challenges in this process.

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?

G15 members generally have limited experience of operating within conditional review mechanisms triggered by early construction milestones, such as completion of the first floor. While members support incentives to accelerate build out, the appropriateness of a single milestone will vary between schemes due to site complexity, delivery arrangements and development type.

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.¹⁷ 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?

We recognise that forward-agreed milestones for future phases could support faster build out in theory. However, members do not typically engage with phased review mechanisms.

Principally, any discretionary approach should be transparent, applied consistently across boroughs, and designed in a way that does not introduce additional delay or uncertainty, while maintaining incentives for the timely delivery of affordable housing.

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?

On balance, G15 members agree with the approach set out in paragraphs 4.8.1 – 4.8.2 of the consultation document. We welcome the provision to seek grant “at or above the benchmark grant rates set out at paragraph 4.5.3” (paragraph 4.8.1), as higher grant rates can play a key role in unlocking stalled sites.

As set out in our response to question 4, it would also be helpful if the GLA permitted RCGF to be used alongside grant. This would help unlock stalled sites, including schemes affected by contractor insolvency or abnormal cost pressures.

In addition to the need to seek grant and CIL relief, as referenced at paragraph 4.8.2, we consider that an additional safeguard should apply before developers are permitted to renegotiate affordable housing provision or tenure mix. Where developers can demonstrate that they have approached a minimum of three housing associations and none has expressed an interest in acquiring [all of] the affordable units, this would

provide legitimate grounds for renegotiation. This would offer reassurance that any reduction in affordable housing or change in tenure mix is genuinely necessary for viability and to enable delivery.

Furthermore, where renegotiation does result in a reduction in the original level of affordable housing secured through a Section 106 agreement, this may also present an opportunity for housing associations to acquire stalled sites and increase the proportion of affordable homes delivered. Housing associations are able to claim grant funding for additional affordable homes delivered above those secured through the Section 106 agreement, which can make acquisition a more viable proposition.

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?

Please see our response to question 10.