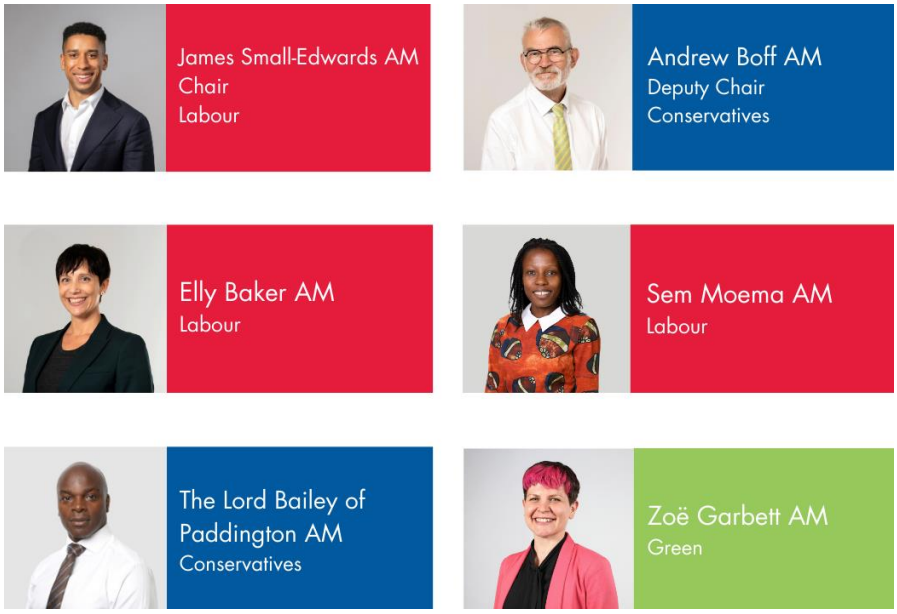
Between skyscrapers and semis: London's missing mid-rise housing

Planning & Regeneration Committee

March 2026

LONDONASSEMBLY

Planning and Regeneration Committee



The Planning and Regeneration Committee examines and reports on matters relating to spatial development, planning and regeneration in London and leads scrutiny of the Mayor's Spatial Development Strategy (the London Plan). The Committee also has lead responsibility for scrutiny of the Old Oak and Park Royal Development Corporation, London Legacy Development Corporation and the Oxford Street Development Corporation.

Report cover image: Hampstead mansion block / Johan Dehlin

Contact us

David Hirst
Head of Policy Scrutiny
David.Hirst@london.gov.uk

William Weihermüller
Policy Officer
William.Weihermueller@london.gov.uk

Daniel Zikmund
External Communications Officer
Daniel.Zikmund@london.gov.uk

Saleha Fazal
Committee Services Officer
Saleha.Fazal@london.gov.uk

Contents

Foreword **4**
Executive Summary **6**
Recommendations **7**
1. Introduction **8**
Our investigation 9
2. Yes to more mid-rise development **12**
3. Mid-rise in the London Plan **16**
London Plan policy 16
From height to density 17
4. Design codes and incremental growth **20**
Design codes bringing certainty 20
Croydon's experiment with design codes 21
Trust, local consent and engagement 23
Upwards extensions and incremental growth 25
Committee Activity **27**
Appendices **28**
Appendix 1: YouGov survey results 28
Other formats and languages **31**
Connect with us **32**

Foreword

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

London is the world's greatest global city. It's not just my view, more importantly it's also the view of TripAdvisor – a much more impartial observer.

Yet in one crucial respect, we remain an outlier. London is far less dense than many of the cities we compare ourselves with.

Neighbourhoods in Paris, Barcelona and Berlin routinely accommodate far more people, with more homes within walking distance of shops, schools and transport. This is a structural challenge that restricts our ability to provide enough homes for Londoners at affordable prices. As London confronts deepening housing need and greater housing targets, a big question is how - and where - we build. If we were to continue with historic patterns of low-density development, particularly prominent in much of Outer London, we will fall further behind. London cannot meet its aspirations on housing, transport and the environment by pushing new low-rise homes to the outer edges of the city, in the process lengthening commutes and embedding car dependency.

Thus, mid-rise development offers a practical way forward. It provides an approach that is both popular and capable of delivering more homes while fitting comfortably within London's urban fabric.

Rather than forcing a choice between only high-rise buildings and low-density suburban growth – skyscrapers or semis – mid-rise neighbourhoods offer a human-scale form of development that supports thriving streets and communities. They also bring significant environmental benefits by reducing travel distances, enabling more energy-efficient building forms and utilising less land.

But density only works when it is placed in the right locations. High-density neighbourhoods that were not well connected, were not thoughtfully designed and did not include a mix of housing typologies have not fared well in lots of European cities.

Greater density is most successful near stations, town centres and well-connected high streets. Places where public transport already exists, and where additional homes can rely on and eventually sustain local services.

These locations – of which we have many already existing in London – remain under-used purely because current policy or local approaches do not enable intensification.

A striking finding of this investigation is that the public are supportive of mid-rise development. When people are shown real examples with greenery, active ground floors and high-quality design, support is strong. Well-designed mid-rise neighbourhoods feel familiar and recognisably London. They offer the scale at which communities thrive and great placemaking becomes more easily achievable.

London must embrace mid-rise development as its preferred form of development in accessible locations. The recommendations that follow set out how London can achieve this. In short, it will require clearer policy, better design standards and a bolder approach to building in well-connected areas.

Mid-rise development is a powerful tool we have to help address our housing crisis and build a more sustainable, more equitable and more liveable London. It's time we embraced it.

Executive Summary

London is at the centre of the housing crisis and facing a perfect storm of challenges impacting development. It is also less densely populated than many other comparable global cities and characterised by a higher proportion of low-rise housing. This is limiting its ability to meet housing need within its existing footprint.

Through the London Plan, the GLA sets the overarching spatial strategy for the capital that governs where, how, and at what scale housing is delivered. A new London Plan is anticipated in 2027, and in Spring 2025 the GLA consulted on its initial proposals in *Towards a New London Plan*. The consultation highlighted the potential of mid-rise development as a way for London to help meet its ambitious housing targets. Given this interest, the Committee wanted to explore the potential of mid-rise development in London in order to feed into the deliberations.

We have found that London should be building more mid-rise housing, given the advantages it offers over other forms of development – both for the built environment and the social and economic outcomes. Mid-rise housing can provide human-scale density that supports neighbourliness, family life and everyday amenities. It supports viable high streets, schools, transport. It also offers environmental advantages and can contribute significantly to London's housing need. As such, we believe mid-rise should become the default answer to housing development in London.

We welcome the GLA's openness to mid-rise development. However, through this investigation we have found that the current London Plan lacks sufficient clarity and direction. The evidence received points to a need for policies that prefer mid-rise in high-access locations, allowing height to respond to transport accessibility, site capacity and surrounding context. We call on the GLA to explore a return to the Density Matrix, which was removed from the current London Plan.

The Committee also heard that design codes offer significant promise in supporting mid-rise delivery, particularly on small and medium-sized sites. But, there also need to be guardrails in place that ensure good design, high quality housing and genuine engagement local acceptability. These guardrails were largely absent in Croydon's design code and, as a result, we heard residents disliked the way in which their homes and streets changed. The GLA also told us it was looking at how these issues could be reconciled in the next London Plan. As a starting point, we can see value in the GLA carrying out a review of their effectiveness.

There may also be some merit in exploring further how upward extensions can support incremental growth. However, the issues with development are being compounded by a lack of trust in the planning system. The evidence we have heard indicates that improving engagement will require earlier, clearer and more place-based conversations about growth. The GLA should fund and oversee two pilot programmes of early-stage engagement linked to Local Plan-making that prioritises mid-rise development by the end of 2027.

Recommendations

Recommendation 1

The next London Plan should establish mid-rise development as the preferred form of new residential development in high access locations.

Recommendation 2

Mid-rise residential development should be explicitly defined in the next London Plan.

Recommendation 3

The GLA should reinstate a Density Matrix in the next London Plan. This should set out where mid-rise or higher density development is most appropriate, focusing on transport accessibility, site capacity and surrounding context that respect existing housing typologies and site characteristics.

Recommendation 4

The GLA should review the effectiveness of the use of Design Codes in London and work with boroughs and local residents, particularly those in Outer London, to establish popular Design Codes for new mid-rise residential development.

Recommendation 5

By the end of 2027, the GLA should oversee and fund two pilot projects that test new ways of involving local communities early in Local Plan or design code processes, with a focus on mid-rise development.

1. Introduction

Up or out? This is the choice often presented when it comes to getting London building. We are told that the capital must either accept more tall buildings or allow continued outward expansion.

London does need to build more homes. Too many Londoners do not have the security of a safe, secure, affordable home that is fit to live in. Yet delivery has stalled. Economic pressures, questions of viability, and delays in approvals from the Building Safety Regulator are all constraining development across the city. At the same time, public opposition to high-rise schemes in unsuitable locations has grown, contributing to delays, uncertainty and conflict in the planning system. Just 6 per cent of respondents to a poll commissioned by the Committee for this investigation indicated a preference for more high-rise buildings in the capital.[1]

London is less densely populated than many other comparable global cities and is characterised by a higher proportion of low-rise housing. In 2021, 88.3 per cent of London's homes were in low-rise buildings (houses, bungalows, or flats in two- to five-storey buildings). By comparison, only 41 per cent of Paris's homes, 48 per cent of New York's, and 62 per cent of Tokyo's were in low-rise (less than or equal to four storeys) buildings.[2]

In the report *Flat Britain: The urban density gap and how to close it*, Centre for Cities argues that London's neighbourhoods need to become denser to meet the city's housing needs. Comparing housing density – measured as housing per residential built-up hectare – the authors suggest that increasing London's density by focussing on mid-rise development to match that of Paris could deliver up to half a million additional homes.[3]

Through this investigation, the Committee heard evidence that modest, widespread increases in density (especially in well-connected areas) could unlock delivery of additional homes with less encroachment on the Green Belt or relying solely on large redevelopment sites (chapter 2). Evidence to the Committee consistently showed that mid-rise housing can provide higher densities without the social, environmental and design challenges often associated with very tall buildings.

[1] See **Appendix 1** to this report for results from the **YouGov** survey
[2] Note: London's figure (2021) includes houses, bungalows, and 2–5-storey flats (≤ 5 storeys), whereas the comparative figures for Paris (1999), New York (2013), and Tokyo (2013) reflect dwellings in buildings of **≤** 4 storeys only; direct comparability is approximate due to slightly different height bands and data years. Sources: GLA, *Housing and Land Housing Research Note 3 Housing in four world cities: London, New York, Paris and Tokyo* (2019), p12 (figures extrapolated)
[3] Maurice Lange, Anthony Breach and Luka Kovacevic, Flat Britain: The urban density gap and how to close it, (Centre for Cities), November 2025

However, while support for mid-risehousing is strong, the investigation found that the London Plan lacks sufficient clarity and direction (chapter 3). The Committee also heard that design codes offer significant promise in supporting mid-rise delivery, particularly on small and medium-sized sites (chapter 4).

What is mid-rise?

Mid-rise development is neither low-rise nor high-rise; it sits between terraces and towers. Mid-rise buildings are tall enough to make efficient use of land, but low enough to feel 'human' in scale. From the Parisian mansion blocks that line grand boulevards to the perimeter blocks of Barcelona's Eixample, mid-rise buildings have long shaped some of Europe's most admired urban neighbourhoods.

Visually, mid-rise often looks like continuous street frontages, with buildings that define the street rather than standing apart from it. Ground floors are commonly active, with front doors, shops, cafés or workspaces, while homes sit above. Rooflines are usually consistent, creating a sense of enclosure without overshadowing the street. Mid-rise development can include:

- Apartments over shops or community uses
- Mansion blocks and perimeter blocks with shared courtyards
- Stacked townhouses and walk-up flats

Our investigation

The London Plan sets the overarching spatial strategy that governs where, how, and at what scale housing is delivered across the capital. A new London Plan is anticipated in 2027, and in Spring 2025 the GLA consulted on its initial proposals in *Towards a New London Plan*.[4]

The consultation highlighted the potential of mid-rise development as a way for London to move beyond its reliance on tower blocks, particularly in suburban areas. In his foreword to the consultation, the Mayor observed: "Many other European cities have more mid-rise development of five to nine storeys. This type of development is less common in London, especially in suburban areas."[5] He also stressed the need to "make better use of the land we have, take opportunities to increase the density of housing developments and work with local councils to substantially increase the rate of building in every borough."[6] The consultation invited views on, amongst other things, introducing a minimum-height benchmark to encourage small-site development.[7]

[4] GLA, Towards a New London Plan, 2025
[5] GLA, Towards a New London Plan, 2025
[6] GLA, Towards a New London Plan, 2025, p5
[7] GLA, Towards a New London Plan, 2025

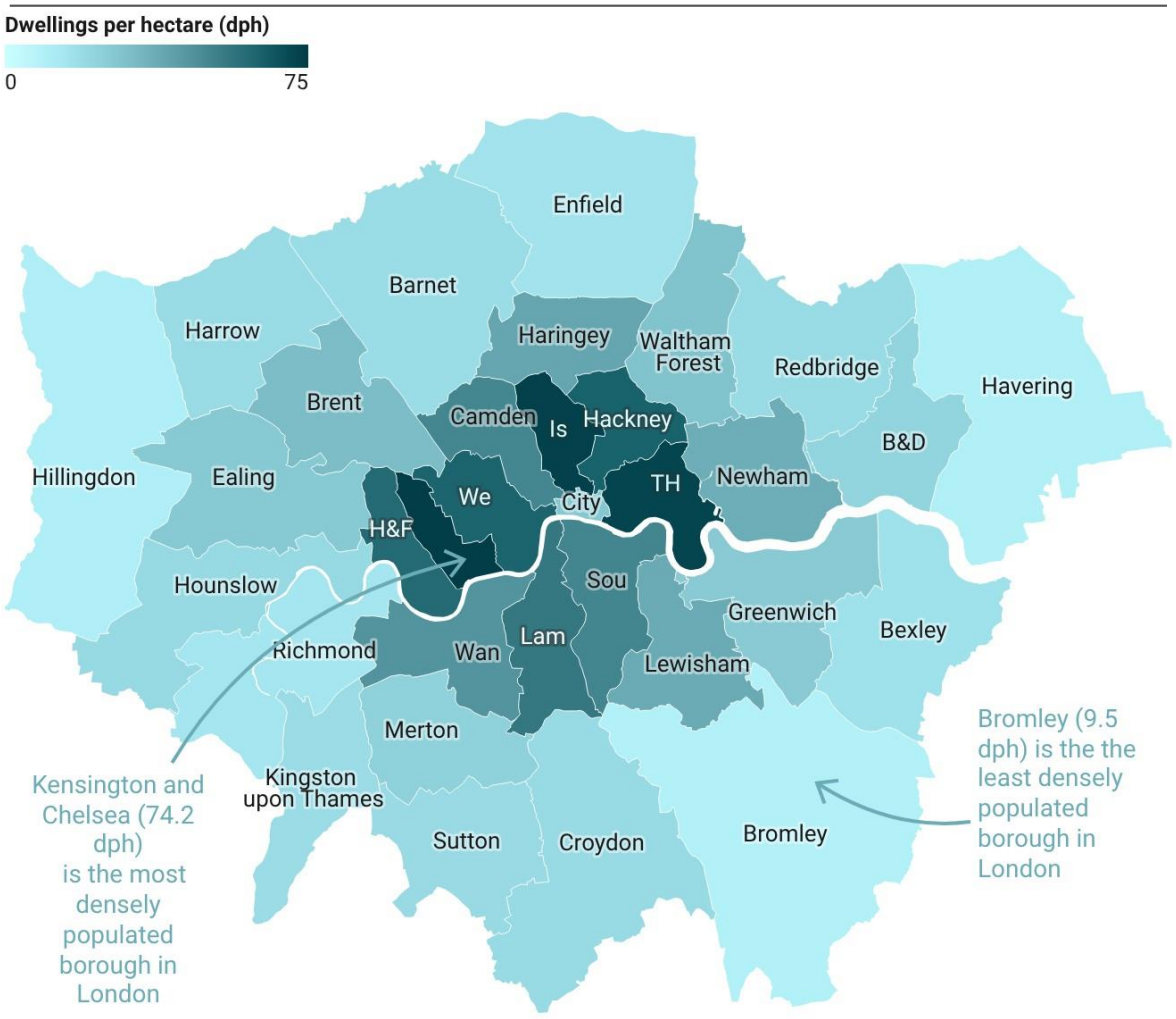
Given this interest, the Committee wanted to explore the potential of mid-rise development in London in order to feed into the deliberations. We specifically wanted to know:

- Whether London should be building more mid-rise housing and how it could contribute to meeting London's housing needs;
- What Londoners views are on mid-rise residential buildings (as opposed to alternatives);
- What factors are affecting delivery of mid-rise housing; and
- What role the Greater London Authority (GLA) and the new London Plan could play in supporting mid-rise.

43% The proportion of London's homes in buildings ranging from 2-5 storeys.

68% The proportion of Londoners who said they want to see a large increase in house building in London.

Midrise is the form of development which the most Londoner's want to see built in London.*



* 16 per cent of Londoners said they wanted to see mid-rise (5-9 storeys) housing built in London, another 16 per cent said low-rise (1-4 storeys) housing and 10 per cent said terraced housing.

2. Yes to more mid-rise development

Londoners are most likely to support low and mid-rise housing, compared to high-rise housing.[8] But the need for a huge uplift in homes and the current policies and guidance means developers and policy makers are instead delivering high rises in London. Between 2013 and 2023, at least 270 20+ storey buildings were built in London.[9] High rises suit some areas and demographics, but not all.

We need more homes. But for greater housebuilding to be sustained and less politically contested, they must be buildings that people can afford and want to live in, and that communities want to have on their streets and neighbourhoods. High rises do not always provide the homes people want and as such should not be the only answer to the challenge of building the 88,000 homes a year London is being asked to over the next 10 years.[10] We believe that a change in planning policy to encourage and facilitate more and better mid-rise development is needed.

This investigation has covered much ground. We have heard there is a perfect storm of challenges impacting development in London. As the Deputy Mayor, Jules Pipe CBE, explained: "cost of steel, Ukraine war, Brexit, regulatory, capacity in boroughs, [and] London Plan policy. You can stack it all up. All this weighs more heavily on viability, and there are fewer and fewer sites that can find their way through to that."[11]

Yet, early on we realised there was a relatively simple answer to our question of whether London should be building more mid-rise housing. That answer is: Yes. There was consensus agreement on this point.

Throughout this investigation, we heard mid-rise housing provides liveable density that supports neighbourliness, family life and everyday amenities. Angus Michie, Managing Director, London Residential Strategy, SevenCapital, told us:

> "[M]id-rise seems to be more attractive to a wider cross-section of the population of London: families, empty nesters, everything. That widens our opportunity to sell. Lots of people are comfortable with the notion of mansion block typology who would not ever want to live in a tower block."[12]

[8] See **Appendix 1** to this report for results from the **YouGov survey**
[9] NLA, London's Growing Up: A Decade of Building Tall, 9 May 2024
[10] GLA, Towards a New London Plan, 2025
[11] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 18 November 2025, p5
[12] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 18 November 2025, p6

"It is interesting, when you live in a mid-rise block, by definition, you are in a series of flats. You are in a community, and that community has to have some cohesion. I lived in a mansion block where we all shared the freehold and we all had to make decisions about what we do, sinking funds, what we do with the open space, etc. I have been in mid-rises in council blocks, and you have to have a similar approach because the council are not providing it. The community comes together, people come together. There are much more communal experiences in mid-rise blocks in general."

Michael Ball, Co-ordinator and Media Worker, Just Space

Evidence also suggested that mid-rise development offers environmental advantages compared with more dispersed low-rise growth and high rise that is less energy efficient.[13] Russell Curtis, Director of architects RCKa and Chair, Barnet Quality Review Panel, told us:

> "Once you start to build at optimal densities, you are less reliant on private vehicles to move around. You are probably closer to both public transport and social infrastructure, shops and community centres, and all those things, but also the operational and embodied carbon involved in building mid-rise boxes is significantly better than the low-rise alternative."[14]

Mid-rise can also contribute significantly to London's housing need, delivering compact but liveable neighbourhoods that support public transport and daily services. Nicholas Boys-Smith MBE, Founder and Director of Create Streets, referred to how mid-rise could achieve what he termed "gentle density". He described this as "a neighbourhood which is dense enough to have the shop down the road, pub around the corner, walkable to Tube or metro or bus or whatever it might be."[15] This is a similar vision to what has been achieved in some of Europe's most admired urban neighbourhoods – where efficient use of land has delivered high levels of density that feel 'human' in scale. Building on this notion of gentle density, Russell Curtis told the Committee:

> "We know that there are optimum densities in all areas, regardless of whether you are in an Inner London or Outer London area. Low density ends up with car dependency and social isolation. Too-high density, you end up with issues of loneliness and issues of isolation again. There is an optimum density, which mid-rise development can offer."[16]

Russell Curtis, similarly told us: "Even a modest uplift in density in some of these areas [within 800 metres of suburban stations] would yield a very significant increase in the number of homes in these areas in sustainable locations."[17]

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[13] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p7
[14] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p8
[15] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p1
[16] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, pp1-2 [17] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, pp2-3
[17] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, pp2-3

"I did an - admittedly quite crude - calculation looking at areas within 800 metres of suburban stations, which is about a ten-minute walk, and worked out that if you lifted all of those areas by 25 per cent, if you increased the housing density by 25 per cent to a minimum of 40, you would deliver something like 850,000 homes." [18]

Russell Curtis, Director, RCKa and Chair, Barnet Quality Review Panel

The Deputy Mayor concurred, with the caveat that nearer to public transport, it may be necessary for development to go taller. In answer to the Committee's question on how mid-rise could alleviate London's housing crisis, he told us:

> "It goes without saying that we should want to minimise creep onto the Green Belt and not build on the Green Belt unnecessarily. It is about optimising the density on the land that is available, the brownfield sites and the grey belt sites. That means defaulting almost invariably to mid-rise except where it is justified to go denser, nearer transport, the closer you get to transport, a gentle rise up to transport nodes, where it is appropriate."[19]

Evidence presented to the Committee suggests that Outer London could – and should – take on a more proportionate share of future growth. In considering how this growth should be delivered, guests argued for a differentiated approach between intensification and infill, reflecting the distinct Inner/Outer London dynamic.[20]

In Outer London, we heard the priority should be intensification around transport hubs, with mid-rise development established as the default typology.[21] This would involve building heights that are greatest closest to stations, gradually stepping down into surrounding neighbourhoods. The Government's recently announced planning reforms include a proposed "default yes" to housebuilding near well-connected train stations where certain criteria are met.[22] This change could help unlock delivery in areas that currently fall short of the "optimum densities" referred to by Russell Curtis.[23]

We welcome the GLA's openness to mid-rise development, as set out by the Deputy Mayor in our meetings, and also in the London Plan consultation. The consultation is an initial step that now needs concrete actions, given the current guidance is not delivering enough of it. The GLA needs to make this preference for mid-rise buildings more explicit and viable through its guidance and policies. We heard repeatedly that the London Plan should treat mid-rise as a

[18] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, pp2-3
[19] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 18 November 2025, p15
[20] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p20
[21] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p20
[22] MHCLG, Housebuilding around train stations will be given default "yes", 18 November 2025
[23] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, pp1-2

default response across much of the city. We believe a 'default to mid-rise' approach could be the answer.

Recommendation 1

The next London Plan should establish mid-rise development as the preferred form of new residential development in high access locations.

Despite the consensus on the need for more mid-rise housing, there was no corresponding simple answer to the question of whether London *can* build enough mid-rise housing of the type and form to meet demand. Nor *how* it should do so.

There are certainly some factors in the London land and property market pushing against mid-rise development. The rising cost of land and land value speculation can push developers to build taller just to make a site financially viable. And this may be having a knock-on effect excluding smaller or mid-rise building types.[24]

Through this investigation, we have heard about certain promising opportunities for achieving more mid-rise development. The rest of this report is an articulation of where and how these could be deployed to achieve the kind of development that will result in liveable, sustainable, affordable neighbourhoods that provide a significant contribution towards meeting London's housing need.

[24] Planning and Regeneration Committee, *Do tall buildings work in London?*, April 2025

3. Mid-rise in the London Plan

The London Plan sets the overarching spatial strategy that governs where, how, and at what scale housing is delivered across the capital. The starting point for any discussion of how London might deliver more mid-rise housing must therefore begin with the London Plan.

London Plan policy

The current London Plan does not include a policy on mid-rise, nor does it prescribe specific densities of development. Instead, Policy D3 requires a design-led approach. Under this policy, boroughs must set appropriate densities through masterplans and frameworks, considering factors such as daylight, privacy, open space, and local context.[25]

There is also accompanying London Plan Guidance (LPG) which provides further detail encouraging mid-rise development, including:

- *Housing Design Standards*, which states that the height of a new development should align with the density parameters and guidance for sites as set out in the local plan, design code, or other guidance documents. [26]
- *Optimising Site Capacity: A Design-led Approach*, which encourages applicants to test mid-rise typologies in areas that are deemed appropriate for tall buildings. The guidance states that mid-rise typologies are often capable of providing higher density than tall buildings and that they are suitable for families and young children.[27]
- *Small Site Design Codes*, which establishes that new development on small sites should follow the predominant roofline, with the potential to add one or two additional storeys, provided they are stepped back.[28]
- *Characterisation and Growth Strategy*, which states that in the "majority of areas with an extensive growth capacity, dense forms of mid-rise typologies are likely to be more appropriate" than tall buildings. The guidance also argues that a greater contribution towards the local character may be achieved through mid-rise development than tall buildings.[29]

Across our investigation, several guests argued that clearer and more consistent policy language is needed for mid-rise in the London Plan. Michael Ball from Just Space, an informal alliance of around 80 community groups engaged with planning, told the Committee that "we need to get a definition of mid-rise in the London Plan, and we need a policy on it. There is a policy on tall buildings. […] We need something similar […] to take away the priority from tall buildings and

[25] See chapter 3 of London Plan 2021
[26] GLA, Housing Design Standards LPG, [accessed 11 March 2026]
[27] GLA, Optimising Site Capacity: A Design-led Approach LPG, [accessed 11 March 2026]
[28] GLA, Small Site Design Codes LPG, [accessed 11 March 2026]
[29] GLA, Characterisation and Growth Strategy LPG, [accessed 11 March 2026]

focus it on mid-rise"[30] suggesting that ambiguity contributes to an overemphasis on towers rather than more deliverable forms of density.

In the GLA's consultation on the London Plan in 2025, it presented a definition for mid-rise of between five and nine storeys. Speaking to this definition, the Deputy Mayor, Jules Pipe CBE, explained the logic as: "One to four clearly has to be considered low-rise. Ten storeys is effectively 30 metres, the strategic height that makes things referrable to the GLA. There is some logic there in deciding that it was five to nine."[31] This interpretation is similar to what we heard from Londoners via a survey commissioned for this investigation (see appendix 1 for full results of the survey). Across this investigation we also heard suggestions for a range of different heights, from four to 12 storeys, often influenced by cost thresholds, planning policy and local context.

The Committee considers that greater clarity in the London Plan is needed to embed mid-rise development more firmly within London's growth strategy.

Recommendation 2

Mid-rise residential development should be explicitly defined in the next London Plan.

From height to density

While the question of how mid-rise is defined is important for policy clarity, many contributors argued we should move beyond a narrow debate about building height and place greater emphasis on density and intensification of neighbourhoods. Maurice Lange, Analyst at the Centre for Cities, told us:

> "One of the issues with the current London Plan is that you have quite blunt cut-offs when it comes to policy. […] If we are thinking about mid-density, maybe we should have a different definition for intensification in the place which currently is low-density and intensification in the place which is currently mid-density. The emphasis should not be on how we should get more five to nine [storey buildings], it should be on how we should increase density, whatever the starting point is."[32]

Several guests stressed that highly accessible locations, particularly around major transport hubs, can support buildings taller than mid-rise. The Committee was told that applying mid-rise as a hard cap risks underusing the best-connected sites and weakening long-term housing delivery. Jules Pipe CBE, Deputy Mayor for Planning, told us that "everywhere is suitable for mid-rise except those places where to only do mid-rise, not high-rise, is missing an opportunity

[30] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 22 October 2025, pp. 21–22
[31] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 18 November 2025, p1
[32] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p2

for density… Next to a busy transport node, it would not make sense to encourage something that was five or six storeys".[33]

Density Matrix

Previous iterations of the London Plan included a "Density Matrix". First introduced in the 2004 London Plan, this linked public transport accessibility and neighbourhood character to recommended ranges of dwellings per hectare. It remained in use until 2016. However, by the 2021 London Plan the Density Matrix was removed due to concerns that it had been applied inflexibly and used to justify poor design.[34] In evidence to the Committee, consultant Dr Liam Bolton whose doctoral research focussed on density and airspace development in London, summarised the problems with the Density Matrix and reasons why it was removed:

> "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. 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."[35]

Despite the issues with Density Matrix, we heard support for its return. Michael Ball described losing the density matrix as a "disaster".[36] Nicola Livingstone, Professor in Real Estate at the University of Glasgow, suggested revisiting the Density Matrix as a flexible framework for optimising density. Liam Bolton provided more qualified support, stating:

> "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."[37]

We welcome the GLA's deeper exploration of how mid-rise could be supported further in the next London Plan. The evidence we have heard points to a need for policies that default to mid-rise, allowing height to respond to transport accessibility, site capacity and surrounding context. In our predecessor Committee's scrutiny of the draft London Plan in 2018, it

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[33] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 18 November 2025, pp. 9–10.
[34] GLA – Draft London Plan – Topic Paper: Housing Density (2017) pp2-3 — finds the matrix "not being followed" (only ~35 per cent of schemes within range; ~50 per cent above; ~15 per cent below) and says its "apparent numeric simplicity has led to it dominating the policy approach to density," justifying a shift away from the matrix.
[35] Planning and Regeneration Committee, Call for Evidence, Dr Liam Thomas Bolton written evidence / Ref No. MID001, November 2025, pp6-7
[36] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 22 October 2025, p22
[37] Planning and Regeneration Committee, Call for Evidence, Dr Liam Thomas Bolton written evidence / Ref No. MID001, November 2025, p7

recommended that the density matrix be restored and linked to Policy D6.[38] Our views haven't shifted since. However, we also recognise the criticisms of the former matrix for being overly rigid and mechanistic.

Therefore, in developing the new London Plan, we consider that the GLA should revisit not only the reinstatement of a Density Matrix, but its modernisation into a more flexible, map-based tool. Such an approach could link density expectations more clearly to factors such as public transport access levels (PTAL), local character and site context, improving clarity while avoiding the inflexibility of earlier versions. This could support a more legible principle of optimising density, including higher densities and building heights in close proximity to transport hubs, with a graduated reduction in scale as development moves further away from stations.

Recommendation 3

The GLA should reinstate a Density Matrix in the next London Plan. This should set out where mid-rise or higher density development is most appropriate, focusing on transport accessibility, site capacity and surrounding context that respect existing housing typologies and site characteristics.

[38] London Assembly Planning Committee, London Plan consultation response, March 2018, p33

4. Design codes and incremental growth

Through this investigation we have heard promising evidence around the use of design codes to support mid-rise development. The Ministry for Housing, Communities and Local Government (MHCLG) guidance on design codes describes them as follows:

> "A design code is a set of design requirements for the physical development of a site or area. It is made up of rules that are clear, specific and unambiguous, and it should normally include extensive graphical illustrations. The code should build upon a design vision, such as a masterplan or other design and development framework for a site or area."[39]

Design codes are produced by boroughs and set out what is expected of developments, including requirements for how the built environment will look and function on particular types of sites or areas. The National Planning Policy Framework (NPPF) highlights that design guides or codes prepared should be consistent with the principles set out in the National Design Guide[40] and National Model Design Code[41].

Design codes bringing certainty

There is no lack of desire to build more housing in London, but there are challenges within the system. Key amongst them for developers is a lack of certainty, which can bring risk and increased costs. As Angus Michie described to the Committee:

> "With many years of experience in the industry now, the number of times you get to [borough] Planning Committee and you really do not know whether you are going to get planning or not is a fairly sad reflection on our industry, when you have spent two/three/four years working away at something and you think, 'Well, I do not know, it is 50:50'. It should not really be like that."[42]

The Committee heard consistent evidence that design codes can play a useful role in supporting the delivery of mid-rise housing, particularly on small and medium-sized sites. Michael Clarkson, Planning Policy Manager, Royal Borough of Greenwich, told us: "As a policymaker, I do support design codes. I think they can be very helpful, certainly when you are looking at particular typologies or particular areas of a borough."[43]

[39] MHCLG, Creating a design code, para 133 [accessed 15 Jan 2026]
[40] MHCLG, National Design Guide, 2021
[41] MHCLG, National Model Design Code, 2021
[42] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 18 November 2025, p10
[43] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 18 November 2025, p11

Design codes were seen as especially valuable where they focus on form, scale, massing and outcomes, rather than prescribing architectural style. Several guests emphasised that codes should define what "good" looks like, without forcing uniformity or pastiche. In evidence to the Committee, Simon Bayliss, Managing Partner, HTA Design LLP, said:

> "A set of standards that defines what good looks like is important. A set of standards that defines a style, or a requirement that it must look like something that already exists, is problematic. […] Design codes can be incredibly powerful at setting constraints, heights, numbers, and [the] provision of facilities and services, but they should, in my view, stop short of defining what style is required."[44]

Croydon's experiment with design codes

Design codes encouraging higher density – often mid-rise housing – have been tried before in Croydon. In 2019, Croydon council published a borough-wide Supplementary Planning Document (SPD). This provided design guidelines – a design code – for building on garages and small empty plots, as well as for demolishing existing semi-detached and detached properties to replace them with proportionately sized housing blocks.[45]

In evidence to the Committee, Russell Curtis described the effect of this policy on development:

> "Effectively, it gave you absolute certainty that if you bought a house, a single house on a large plot or a pair of semis, that you could replace that with, in some cases, 20 or 30 flats. It gave you absolute certainty that you would get planning for that. As a result of the certainty, the developers built out. They knew what their exit would be, and they knew that there was no point in trying to constantly extract more and more value by selling it on and somebody coming in with a new application. They knew what the site could accommodate."[46]

As a result of this design code, Croydon became an outlier in small-site delivery compared with other outer London boroughs. Research by Centre for Cities highlighted that this meant Croydon delivered three times as many properties as Barnet, the next highest borough.[47]

In the case of Croydon's SPD, the Committee heard that the quality of development delivered was mixed. Concerns were raised about cumulative impacts on neighbourhood character. However, the SPD failed to achieve broad support locally and it was revoked by the new council administration following the 2022 local elections. Nicholas Boys-Smith recounted conversations he had with residents affected by the changes, who he said, "regarded it as something alien, changing the nature of their homes and their streets in a way that they emotionally did not

[44] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 18 November 2025, p10
[45] Croydon borough council, Suburban Design Guide, 2019
[46] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p16[47] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p16
[47] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p16

like."[48] The failure in Croydon, according Nicholas-Boys-Smith, was ultimately that the buildings were not acceptable to residents.[49]

The policy also became politically contentious and was ultimately reversed following local opposition in July 2022.[50] As Russell Curtis summarised it:

> "The problem with the Croydon SPD was that it was concentrated in a small number of locations, and that had an absolutely profound effect on the character of those areas, which is why it was politically very difficult and ended up being scrapped by the incoming [Executive] Mayor [of Croydon]."[51]

So, what can we take from Croydon's experiment with design codes. That the certainty offered by design codes must be paired with quality safeguards and local engagement and support. Therefore, buildings need to be physically attractive to local residents in order to be less politically controversial.

"Place is emotional; we know this now from the research, you know that as politicians. When you have lived in - this is an academic fact - a place for longer, you have got more emotional attachment to it, and there is an innate small-c conservatism in most of us that then does not want it to change."[52]

Nicholas-Boys Smith, Create Streets

When asked specifically about whether the example from Croydon could be replicated London-wide, the Deputy Mayor said, "I would reserve judgement on how one would introduce such a policy" while acknowledging "it would be a very good supply of medium-rise supply across London".[53] The GLA also told us that it was looking at how the London Plan can provide "as much clarity and certainty as possible".[54]

The Committee considers that design-code-led approaches, if applied sensitively listening to local residents and in partnership with boroughs, in wider ranges of contexts could help unlock mid-rise delivery across London while maintaining, and even enhancing, design quality and local character. The GLA's 2023 London Plan Guidance already encourages design codes in specific circumstances.[55] As a starting point to encouraging design codes in a wider set of contexts, we can see value in the GLA carrying out a review of their effectiveness to date.

[48] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p16
[49] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p16
[50] Centre for Cities, Designing density: How to increase the supply of housing in existing residential areas | Centre for Cities, [accessed 11 March 2026]
[51] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p16
[52] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p21
[53] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 18 November 2025, p11
[54] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 18 November 2025, p11
[55] GLA, Small Site Design Codes LPG, [accessed 11 March 2026]

Recommendation 4

The GLA should review the effectiveness of the use of Design Codes in London and work with boroughs and local residents, particularly those in Outer London, to establish popular Design Codes for new mid-rise residential development.

Trust, local consent and engagement

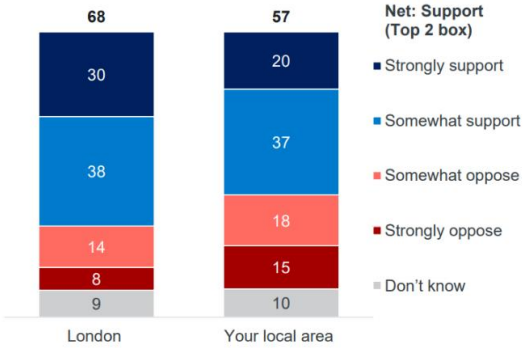
Through this investigation we have also heard about a lack of trust in the planning system for everyday Londoners and how little engagement they have with the decisions that are shaping the city. As Hana Kapetanovic, Lead Researcher at the thinktank Demos, told us:

> "[I]t is really a small minority that gets involved in planning right now. Our polling showed 11 per cent of Londoners said that they had commented on a planning application in the past year, and 51 per cent of people - Londoners specifically - said they do not know how to take part in consultations about developments in their local areas. There is a massive knowledge gap. Mid-rise housing is not something people are talking about. People are not talking about housing much at all."[56]

Several guests suggested that those in favour of housebuilding are not being heard. Shreya Nanda, Advisor at housing campaign group London YIMBY, told the Committee: "there is broad popular support for housebuilding, so it is important that we are not listening to a small minority who engage quite loudly with the process."[57] In polling commissioned for this investigation, we similarly found a majority of Londoners support more housebuilding (see graphic below).

Nearly seven in ten Londoners (68%) **support a large increase in the building of new housing in London**, compared to under six in ten (57%) supporting this for **their local area**.

Support for large amount of new housing built in... (%)



Demographics

Men, **ABC1** Londoners, **Black** Londoners, **inner** Londoners, **private renters**, and **disabled** Londoners are most likely to support a large increase in the building of new housing in **London**.

Men, those aged **18 to 34**, **Black** Londoners, **inner** Londoners, and **private renters** are most likely to support a large increase in the building new housing in their **local area**.

[56] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 22 October 2025, p11
[57] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 22 October 2025, p9

We heard that digital tools, community review panels and more interactive engagement methods could help broaden participation beyond the "usual suspects".[58] Hana Kapetanovic, from Demos, for example spoke enthusiastically about several examples of digital engagement tools. Contrasting this with the way in which people typically engage with planning she said that it provides for "a slightly different way of doing it. [...] It feels more participatory but also you come up with a consensus rather than division."[59]

We also heard that there needed to be more done to get people to engage on the bigger, strategic questions. Russell Curtis told us:

> "I would much rather that we have an honest discussion about the fact that we do need to build homes, we together collectively decide where they need to go [...] These decisions should be made strategically much earlier so that there is buy-in from the local community."[60]

Yet, this isn't simple. As Michael Clarkson, explained "High-level policies that cover all sorts of scenarios are quite difficult to engage local people in, to get involved in discussing how that might affect them."[61] What you do hear from the local community via engagement, according to Simon Bayliss, Managing Partner of architects HJ Design LLP, is:

> "[A]ll sorts of fantastic and useful things about where they live, how they get around, and what they do to make the place a community, what we might be able to try and instil in the development coming forward, and how they might find their way to support the development because it brings benefit to them directly, and to their family and their friends. "[62]

The evidence we have heard indicates that improving engagement will require earlier, clearer and more place-based conversations about new development. While early engagement has limits, advances in digital tools and participatory methods mean, it is worth testing new approaches, particularly where design codes and mid-rise strategies are being developed. As Hana Kapetanovic emphasised to the Committee, "when we are thinking about what methods to use it also depends on the question that we are asking."[63] Rebuilding trust will depend not only on consultation processes, but on whether communities can see tangible benefits and understand the constraints shaping development decisions.

Recommendation 5

By the end of 2027, the GLA should oversee and fund two pilot projects that test new ways of involving local communities early in Local Plan or design code processes, with a focus on mid-rise development.

[58] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 22 October 2025, pp14-15
[59] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 22 October 2025, p14
[60] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p7
[61] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 18 November 2025, p13
[62] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 18 November 2025, p16
[63] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 22 October 2025, p14

Upwards extensions and incremental growth

Many buildings across London were historically designed to accommodate additional storeys, and past generations routinely built upwards to meet changing needs.[64] Through this investigation, we heard suggestions that upwards extensions represent a largely untapped opportunity deserving of more strategic support in the London Plan.

> *"There is significant potential to build more rooftop homes in Greater London. As a way of incrementally increasing housing supply and achieving sustainable densification, upwards extensions should be a more important element of the London Plan."*[65]
>
> ***Dr Liam Bolton, Consultant***

Revisiting this tradition could provide a practical response to land scarcity, enabling growth that is embedded within existing neighbourhoods and supported by existing infrastructure

Evidence presented to the Committee indicated upwards extensions could help deliver incremental growth. As Dr Nicola Livingstone described it to us this could involve "adding value to existing properties and extending units […] to make these more mid-rise medium-density homes."[66] Other benefits can also be achieved through improvements to the fabric of the building when extending.[67]

Yet, we also heard some scepticism as to whether upward extensions would be likely to deliver on the numbers of homes London needs. Simon Bayliss told us, "I do not think there is scope for huge numbers to be delivered on rooftop development."[68] Nor did Maurice Lange think this is where the attention needed to be directed. He told us: "In terms of contribution to overall housing supply, it is more likely that you will get more from the big [and] small sites than you will get from a trickle of adding one storey here and there, and that will all interact with the land values in the given place."[69]

Upward extensions can add homes and improve existing buildings. Nicholas Boys-Smith highlighted an example from Tottenham which had "created 200 additional extensions over a decade period".[70] Even where such extensions are simply adding new capacity to existing homes, that adds bedrooms may also free up homes elsewhere. But they are not suitable everywhere. Given these challenges, we can see that incremental growth will be important, but

[64] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p10
[65] Planning and Regeneration Committee, Call for Evidence, Dr Liam Thomas Bolton written evidence / Ref No. MID001, November 2025
[66] London Assembly Planning and Regeneration Committee, Transcripts, Panel Two, 22 October 2025, p20
[67] Planning and Regeneration Committee, Call for Evidence, Dr Liam Thomas Bolton written evidence / Ref No. MID001, November 2025
[68] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 18 November 2025, p18
[69] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, p11
[70] London Assembly Planning and Regeneration Committee, Transcripts, Panel One, 22 October 2025, pp6-7

the GLA's focus should be on bigger plots. Given the many different types of buildings that could be extended, this is an area where boroughs are best placed to lead. Where the GLA can add value is through its capacity to support and deliver research and analysis on a pan-London basis. This could be deployed to interrogate the effects of policies and design codes intended to encourage upwards extensions and incremental growth.

Committee Activity

The Committee held two formal meetings on 22 October and 18 November 2025 and heard from the following guests.

- Maurice Lange, Analyst, **Centre for Cities**
- Russell Curtis, Director, **RCKa** and Chair, Barnet Quality Review Panel
- Nicholas Boys Smith MBE, Founder and Director, **Create Streets**
- Shreya Nanda, Advisor, **London YIMBY**
- Hana Kapetonavic, Researcher, **Demos**
- Michael Ball, Coordinator and Media Worker, **Just Space**
- Nicola Livingstone, Professor of Real Estate, **University of Glasgow**
- Simon Bayliss, Managing Partner, **HTA Design LLP**
- Michael Clarkson, Planning Policy Manager, **Royal Borough of Greenwich**
- Angus Michie, Managing Director, **SevenCapital**
- Sarah Birt, Head of Development, **GLA** Land and Development
- Jules Pipe CBE, Deputy Mayor for Planning, **GLA**
- Alan Smithies, Principal Strategic Planner, **GLA**

The Committee received two submissions to its call for evidence from:

- Emma Bennett, Senior Planning Manager, **Related Argent Limited**
- Dr Liam Thomas Bolton, Spatial Data Scientist & Researcher

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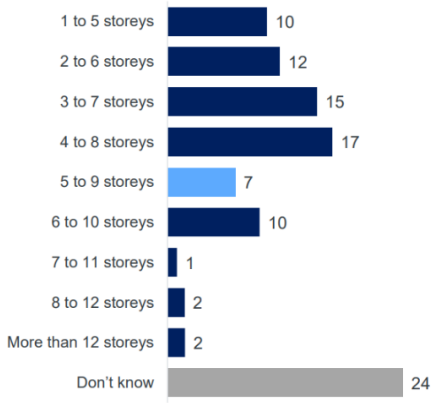
Appendices

Appendix 1: YouGov survey results

Only 7% of Londoners **correctly identified** mid-rise housing to consist of buildings with 5 to 9 storeys, with the most commonly chosen height being 4 to 8 storeys (17%).

Which best describes the number of storeys in "mid-rise housing" (%)

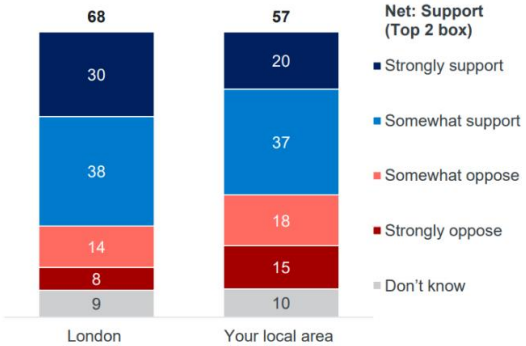


Demographics

Londoners aged **65 and over** are more likely to correctly describe mid-rise buildings as having 5 to 9 storeys compared to their counterparts.

Nearly seven in ten Londoners (68%) **support a large increase in the building of new housing in London**, compared to under six in ten (57%) supporting this for **their local area**.

Support for large amount of new housing built in... (%)



Demographics

Men, **ABC1** Londoners, **Black** Londoners, **inner** Londoners, **private renters**, and **disabled** Londoners are most likely to support a large increase in the building of new housing in **London**.

Men, those aged **18 to 34**, **Black** Londoners, **inner** Londoners, and **private renters** are most likely to support a large increase in the building new housing in their **local area**.

Londoners are most likely to support **building mid** (16%) and **low-rise housing** (16%) in London.

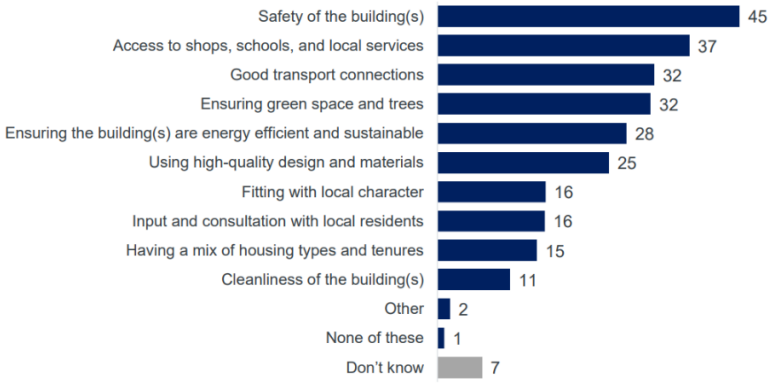
What building type they want to see built in London
(% rebased on all Londoners)

Demographics

Men, **ABC1s**, **inner** Londoners and **private renters** are most likely to support building mid-rise housing.

When building mid-rise housing, Londoners are most likely to important factors to include **safety** (45%), followed by **access to services** (37%), **transport connections** (32%) and **green spaces** (32%).

What factors are important when building mid-rise housing
(% up to 3 choices)



Demographics

Safety is most likely to be seen as important by **women** and those aged **35 to 49**.

Methodology

This survey was carried out by YouGov for the GLA between 21st Oct to 27th Nov 2025, with a response of 1,058 London residents aged 18+.

The figures have been weighted to be representative of all London adults.

Respondents completed the surveys online from an email link.

Data is analysed by gender, age, ethnicity, social grade, home ownership, disability, and inner/outer London. Where these are not mentioned there are no significant differences.

Other formats and languages

If you, or someone you know needs this report in large print or braille, or a copy of the summary and main findings in another language, then please call us on: 020 7983 4100 or email assembly.translations@london.gov.uk

Chinese

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Email 与我们联系。

Hindi

यदि आपको इस दस्तावेज का सारांश अपनी भाषा में
चाहिए तो उपर दिये हुए नंबर पर फोन करें या उपर दिये
गये डाक पते या ई मेल पते पर हम से संपर्क करें।

Vietnamese

Nếu ông (bà) muốn nội dung văn bản này được dịch sang
tiếng Việt, xin vui lòng liên hệ với chúng tôi bằng điện
thoại, thư hoặc thư điện tử theo địa chỉ ở trên.

Bengali

আপনি যদি এই দলিলের একটা সারাংশ নিজের ভাষায় পেতে চান,
তাহলে দয়া করে ফো করবেন অথবা উল্লেখিত ডাক ঠিকানায় বা
ই-মেইল ঠিকানায় আমাদের সাথে যোগাযোগ করবেন।

Greek

***Εάν επιθυμείτε περίληψη αυτού του κειμένου στην γλώσσα
σας, παρακαλώ καλέστε τον αριθμό ή επικοινωνήστε μαζί
μας στην ανωτέρω ταχυδρομική ή την ηλεκτρονική διεύθυνση.***

Urdu

اگر آپ کو اس دستاویز کا خلاصہ اپنی زبان میں
درکار ہو تو، براہ کرم نمبر پر فون کریں
یا مذکورہ بالا ڈاک کے پتے یا ای میل
پتے پر ہم سے رابطہ کریں۔

Turkish

Bu belgenin kendi dilinize çevrilmiş bir özetini
okumak isterseniz, lütfen yukarıdaki telefon
numarasını arayın, veya posta ya da e-posta
adresi aracılığıyla bizimle temasa geçin.

Arabic

إذا كنت أنت أو أحد معارفك بحاجة إلى هذا التقرير
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Punjabi

ਜੇ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਦਾ ਸੰਖੇਪ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਲੈਣਾ
ਚਾਹੋ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਇਸ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ
ਉਪਰ ਦਿੱਤੇ ਡਾਕ ਜਾਂ ਈਮੇਲ ਪਤੇ 'ਤੇ ਸਾਨੂੰ ਸੰਪਰਕ ਕਰੋ।

Gujarati

જો તમારે આ દસ્તાવેજનો સાર તમારી ભાષામાં
જોઈતો હોય તો ઉપર આપેલ નંબર પર ફોન કરો
અથવા ઉપર આપેલ ટપાલ અથવા ઈ-મેઈલ સરનામા
પર અમારો સંપર્ક કરો.

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