



## G15 Residents' Group

*A forum to unify and promote the resident voice to influence, reform and celebrate social housing*

### **GLA Support for Housebuilding: London Housing Plan (LPG) Consultation**

Changes to London House Standards and time-limited planning route

#### ***Response submitted on behalf of mixed-tenure residents and tenants in social housing, represented by the G15 Residents' Group***

21 January 2026

The G15 Residents' Group (G15RG) represents residents across G15 housing associations. This consultation response reflects the collective views of our diverse membership and represents the lived experience of the 1 in 10 Londoners housed by G15 landlords.

**Lead G15RG member name:** Pamela Newman

**Response from:** G15 Residents' Group

**Contact email:** [enquiries@G15Residents.co.uk](mailto:enquiries@G15Residents.co.uk)

#### **Introduction**

The G15 Residents' Group welcomes the GLA's intention to accelerate delivery of affordable homes. However, members consistently emphasised that speed must not come at the expense of quality, safety or long-term liveability. Across all three areas of proposed change—design flexibility, the time-limited planning route and the Equality Impact Assessment—residents supported proportionate, evidence-based flexibility where this unlocks delivery, but remained clear that essential safeguards must be retained. The group's feedback highlights the importance of resident-informed decision-making to ensure new homes meet the needs of diverse communities, protect vulnerable groups, and promote fairness across mixed-tenure developments.

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#### **Part 1 – Design Flexibility**

The GLA proposes to consult on emergency London Plan Guidance (LPG) removing or loosening restrictions on:

- a) Cycle storage – LPG Standard B3.1
- b) Dual-aspect windows – LPG Standard C4.1
- c) Number of dwellings per core – LPG Standard B2.5

##### **a) Cycle Storage – LPG Standard B3.1**

While reduced cycle parking may provide design flexibility, G15RG members expressed strong concerns about the potential impacts. Residents consistently highlighted the need for secure, safe and practical storage, particularly as many Londoners rely on cycling for affordable, healthy, and sustainable travel. Schemes with good cycle facilities already demonstrate the benefits of supporting active travel.

Survey results reinforce this position:

- 54% opposed reducing cycle parking
- 31% supported it
- 15% were unsure

Residents believe reduced provision would undermine safety and create management issues, with bikes likely to be stored in corridors and stairwells—already a common fire hazard and source of neighbour conflict. External storage is viewed as essential, especially given the risks posed by e-bikes and scooters if stored indoors.

Key resident concerns:

- Contradiction with borough car-free and clean air policies.
- Increased fire-safety risks and pressure on landlords to enforce storage rules.
- Negative impacts on disabled residents relying on accessible storage; potential equality implications.
- Greater health inequalities if cycling becomes less accessible, especially for low-income and health-vulnerable residents.
- Higher risk of theft and personal safety concerns if residents must store bikes outside insecurely.
- Internal storage risks (e.g., blocked escape routes) not accounted for in standard fire-safety assessments.
- Minimal benefit to housing supply; limited viability gains do not justify the potential harm.

Although cycle storage requirements are widely recognised as costly and can have a genuine impact on viability, residents emphasised that the significant safety, accessibility and health implications outweigh these financial considerations.

A small number of residents expressed conditional support, limited to cases where relaxing standards would unlock stalled development—and only where safe, well-designed alternative storage is fully guaranteed. They noted that some flexibility could be acceptable if accompanied by clear stakeholder responsibilities, such as councils providing secure public bike hangars where on-site capacity must be reduced, to help maintain feasibility while safeguarding resident needs.

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## **b) House Design Standard C4.1 – Dual-Aspect Homes**

Survey results show mixed views on making dual-aspect optional rather than required:

- 39% supported the proposal
- 46% opposed it
- 15% were unsure

This indicates that while residents recognise potential benefits, a small majority remain cautious about loosening the standard.

Residents acknowledged that limited relaxation of the dual-aspect requirement could offer design flexibility, especially on constrained sites. Potential advantages identified include:

- more efficient internal layouts
- the ability to deliver additional homes on space-restricted plots
- opportunities to mitigate noise through controlled façade orientation

However, residents were clear that dual-aspect should remain the aspirational norm, and any departure must be carefully justified. While well-designed single-aspect homes can function effectively, poorly executed designs present significant risks:

- reduced natural light and poorer ventilation
- greater overheating, especially during increasingly frequent heatwaves
- potential long-term health impacts and higher energy use (lights on more often)
- increased likelihood of future complaints and strain on landlord–tenant relationships
- increased inconsistent design quality across private and affordable tenures

Residents stressed that the risks of overheating and poor air quality would disproportionately affect children, older residents, disabled people, and others more vulnerable to heat and poor ventilation.

Concerns also focused on latent design flaws—issues like inadequate daylight or ventilation may only become apparent after occupation, leading to avoidable management challenges. Residents repeatedly noted that dual-aspect homes provide demonstrable benefits: better air movement, improved wellbeing, and enhanced comfort.

Several members suggested that a performance-based approach—requiring verified daylight levels, window size parameters, and ventilation performance—could be more meaningful than enforcing dual-aspect in every case. They emphasised that design quality, façade treatment, and building orientation are often stronger predictors of healthy interiors than aspect alone.

#### Overall Position

Residents are open to *limited and evidence-based flexibility*, but maintain that:

- Dual-aspect should remain the preferred and expected standard.
- Any deviation must be rigorously justified, demonstrably non-harmful, and subject to transparent design-quality checks.
- Relaxation should not result in lower-quality or stigmatised Affordable homes on a scheme, nor compromise residents' health, comfort, or long-term wellbeing.

In short, residents agreed that if a home is poorly designed, “aspect is the least concern”—reinforcing that the priority must always be overall design quality, not simply the loosening of standards.

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#### c) Dwellings per Core – LPG Standard B2.5

This proposal was the **most strongly opposed** change. Survey results show:

- 7% (1 resident) supported removing limits on dwellings per core
- 62% (8 residents) opposed the change
- 31% (4 residents) were unsure

The concerns raised by residents clearly align with this overwhelming opposition. Members identified significant risks associated with increasing the number of homes served by a single core (ie., stairwell), including:

- Overcrowding and congestion in circulation spaces
- increased noise transfer and a higher likelihood of anti-social behaviour
- greater pressure on lifts and stairwells as the number of residents relying on a single core increases

- more emergency-evacuation scenarios for disabled or vulnerable residents
- long-term building-management pressures that cannot be “designed out” once built

Residents also noted that the proposal includes no upper limit, raising concerns about how far core sizes could expand without adequate safeguards. They stressed that regulatory compliance alone does not address everyday operational pressures, such as lift and stairwell capacity, everyday congestion, and security within shared internal areas must also be taken into account.

Concerns extended to lifts in particular. Many residents reported that new-build schemes already experience frequent lift breakdowns, long repair times and unclear accountability between developers, freeholders and managing agents. Increasing the number of residents dependent on a single lift bank was seen as likely to exacerbate breakdown frequency, waiting times, and service failures, with disproportionate impacts on disabled people, older residents and families with babies and young children.

Residents also highlighted broader accessibility and equality impacts, which they felt were not sufficiently addressed in the GLA’s EqIA. These include:

- increased isolation where communal areas become crowded or difficult to navigate
- restricted movement for wheelchair users if corridor widths, manoeuvring space or circulation routes become compromised
- difficulty adapting homes that are not built to accessible standards, increasing the risk of forced moves
- greater reliance on health and social care services when unsuitable environments undermine independent living
- deterioration in mental and physical wellbeing due to stress, noise, overcrowding and unsafe shared spaces

While some residents acknowledged that flexibility could theoretically help speed up delivery, they made clear that any such approach would require robust evidence that residents’ safety and accessibility would not be negatively affected. Without clear accountability mechanisms for developers, residents expressed concern that optional standards may in practice be treated as “never required”, creating preventable long-term problems in future social-housing blocks.

Overall, the combined survey results and resident testimony strongly support maintaining clear safeguards and limits on dwellings-per-core ratios. Residents emphasised that early resident-informed design processes are essential to avoid creating overcrowded, unsafe or inaccessible homes that future generations will struggle to live in, manage or maintain.

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## **Part 2 – Time-Limited Planning Route**

Survey responses show strong resident support for the proposed time-limited fast-track planning route, with

70% (9/13) agreeing,

15% (2/13) disagreeing,

15% (2/13) unsure.

Residents recognise the potential to accelerate the delivery of genuinely affordable homes, but emphasise that speed must not compromise quality, design integrity, or oversight.

Support for fast-track approval is conditional upon:

- verified compliance with design standards, including resident-led verification
- transparent publication of Equality Impact Statements
- clear, accessible tenure-mix schedules
- demonstrable evidence of meaningful and early resident engagement
- clear accountability and oversight of any design or viability-driven changes

This strong support, combined with clearly articulated safeguards, represents a balanced, resident-backed position.

Residents also raised broader system issues. The current misalignment between national policy, the London Plan, and local plans creates confusion and inconsistent expectations for developers; government should better align these frameworks. Similarly, the success of the fast-track route is heavily dependent on higher grant rates, without which the intended acceleration of affordable housing delivery is unlikely to materialise.

The GLA's proposal to introduce enhanced call-in powers was broadly supported, with residents recognising that a more streamlined decision-making route could help unlock stalled schemes. However, members also noted that any shift in where planning decisions are taken naturally involves trade-offs in how responsibilities are shared between GLA and local authorities—. This warrants careful attention to ensure that local knowledge, community input and borough-level housing priorities remain fully embedded in the process, even where call-in powers are used.

Residents also highlighted concerns that reducing the affordable-housing requirement from 35% to 20%, with a 60% social rent / 40% intermediate split, could have negative impacts on protected groups, who already face higher risks of homelessness and housing inequality. In addition, no clear evidence has been provided demonstrating how many additional homes—particularly affordable homes—these measures would actually deliver. Other factors affecting viability, such as rising build and labour costs, remain unaddressed, while the financial burden falls disproportionately on affordable housing rather than prompting scrutiny of developers profit margins (commonly 15–20% of GDV).

During group discussions, members also raised longstanding concerns about stigma in mixed-tenure developments and how planning and design decisions can inadvertently reinforce it. This includes a well-recognised risk that, when standards are relaxed, the lower-cost Section 106 affordable homes may be the parts of a scheme where reduced design requirements are concentrated—while private sale homes exceed these standards. Members reflected on past experiences of S106 blocks being delivered to materially different quality levels, with poorer layouts, worse light and ventilation, and less access to amenities, which can entrench tenure-based stigma and create management challenges. Residents emphasised the importance of ensuring that any new flexibility in design standards is applied consistently across all tenures, and does not lead to a repeat of two-tier design outcomes.

Many residents stressed that, taken together, these measures could still result in “four out of five homes” being unaffordable—out of reach for most Londoners—while failing to address the structural barriers that consistently constrain delivery.

Overall, residents would rather developers take the necessary time to design high-quality homes that fit well within existing communities, local character, and long-term sustainability.

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### Part 3 – Equality Impact Assessment (EqIA)

Survey responses indicate mixed but cautious resident views on potential equality impacts, with 33% identifying possible negative impacts, 17% seeing none, and 50% unsure.

This uncertainty highlights limited confidence in the GLA’s EqIA and the need for deeper, more robust analysis.

Residents identified several ways in which protected groups may be disproportionately affected:

- **Reduced cycle storage** may disadvantage disabled residents, older people needing ground-floor or accessible storage, young families, low-income residents, and people who rely on bicycles for work.
- **Higher dwellings-per-core ratios** may negatively affect neurodivergent people, residents with sensory or mobility impairments, older residents, and families with pushchairs due to increased noise, footfall, congestion, and more complex emergency evacuation.
- **Reduced daylight and ventilation** increase risks of damp and mould—issues that particularly affect children, disabled residents, older people and those living with respiratory conditions—and run counter to the principles of Awaab’s Law.
- **Relaxation of dual-aspect requirements** may disproportionately affect groups sensitive to poor air quality and low natural light, including children, older and disabled residents.
- **Lack of clear accountability mechanisms** may result in optional standards becoming under-delivered in practice, exacerbating existing inequalities in mixed-tenure developments.

Residents stressed that these risks have material consequences for health, wellbeing, safety and everyday living conditions. They also highlighted the potential for increased overcrowding in circulation spaces, higher levels of noise, more neighbour conflict and greater management pressures—all of which can deepen stigma and inequality for social and affordable housing residents, who disproportionately represent protected characteristics.

More broadly, residents expressed concern that the EqIA functions as a procedural exercise rather than a substantive analysis. They called for:

- Direct engagement with organisations representing people with protected characteristics.
- Stronger consideration of intersectionality, which they felt was largely absent.
- Consistent embedding of resident insight into future EqIAs to ensure lived experience is valued alongside technical and commercial evidence.
- A review of planning language, noting that terms such as “dwellings” and “units” can feel dehumanising and risk reinforcing bias.

Overall, residents believe the equality implications of the proposals have been under-explored. They strongly support a strengthened EqIA—centred on inclusive engagement, intersectional analysis and clearer safeguards—before any changes to the SHLPG are taken forward.

## Conclusion

Residents broadly support measures that can accelerate the delivery of genuinely affordable homes, provided that safety, quality and equity are maintained. Across all three consultation areas, members welcomed pragmatic flexibility but consistently emphasised the need for strong, enforceable standards that protect resident wellbeing and ensure long-term sustainability. They also called for a more rigorous and inclusive approach to equality analysis, recognising that poorly assessed or weakened standards risk deepening existing disparities in mixed-tenure developments. Taken together, the feedback underscores the importance of embedding resident insight at every stage of policy development to deliver homes and communities that are safe, healthy, inclusive, and fit for the future.

Signed

**Pamela Newman**

On behalf of The G15 Residents' Group

21 January 2026

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## G15 Residents' Group – Questions and Results

**Topic:** GLA Support for Housebuilding – London Housing Plan (SHLPG)

**Focus:** Changes to London Housing Standards and Time-Limited Planning Route

**Date:** 20 January 2026

### Purpose

This survey aims to provide statistical responses to the consultation questions, ensuring that the diverse views of individual G15 Resident Group members are accurately captured and represented. Insights gathered from both the survey and group discussions help explain residents' reasoning and inform the policy proposals currently being considered by the Greater London Authority (GLA) to accelerate housebuilding and improve viability. Thirteen of the nineteen G15 Resident Group members took part in this survey.

### Part 1: Design Flexibility

#### a) Cycle Storage

*Do you agree with reducing cycle parking requirements to allow more design flexibility?*

- Yes **4** (out of 13) 31%
- No **7** (out of 13) 54%
- Unsure **2** (out of 13) 15%

#### b) Dual Aspect

Do you agree with making dual-aspect windows optional rather than required, giving developers flexibility in design?

- Yes **5** (out of 13) 39%
- No **6** (out of 13) 46%
- Unsure **2** (out of 13) 15%

### **c) Dwellings per Core**

*Do you agree with removing the limit on the number of homes per core, so developers can decide on based on design and safety?*

- Yes **1** (out of 13) 7%
- No **8** (out of 13) 62%
- Unsure **4** (out of 13) 31%

### **Part 2: Time-Limited Planning Route**

*Do you agree with introducing a time limited fast-track planning route for developments that meet these affordable housing thresholds and conditions?*

- Yes **9** out of 13) 70%
- No **2** (out of 13) 15%
- Unsure **2** (out of 13) 15%

### **Part 3: Equality Impact**

*Do you consider that any of the proposed changes set out within the SHLPG could result in additional negative impacts on those with protected characteristics already identified?*

- Yes **4** (out of 12) 33%
- No **2** (out of 12) 17%
- Unsure **6** (out of 12) 50%