

DRAFT NEW LONDON PLAN 2026

CONSULTATION RESPONSE

Response from: BusinessLDN, One Oliver's Yard, 55-71 City Road, London EC1Y 1HQ

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Date submitted: 15 October 2026

INTRODUCTION

1. BusinessLDN is a business membership organisation with the mission to make London the best city in the world to do business, working with and for the whole UK. BusinessLDN works with the support of the capital's major businesses in key sectors such as housing, commercial property, finance, transport, infrastructure, professional services, ICT and education. The Mayor's London Plan is of significant interest to our members across all sectors given the critical role it plays in the growth and future success of the city.
2. Since the DNLP consultation was launched in July, the final version of the new National Planning Policy Framework (NPPF) has been published. For the first time, the new NPPF 2026 provides a policy (PM14) specifically covering the examination process for spatial development strategies (SDSs), including bespoke tests for an SDS to be found "sound". Furthermore, policy PM1(1) sets out a clear purpose for SDSs, as follows:

"Spatial development strategies should set a positive vision for future growth and change at a sub-regional scale and provide a clear spatial framework for investment and growth, including for new housing. Their content should be genuinely strategic in nature and allow for more detailed issues to be considered and addressed through other parts of the development plan."

3. Also, for the first time, the NPPF 2026 provides a suite of national development-management policies (NDMPs) and a clear instruction at PM6(1) that:

"All plan-makers should, in preparing plans:

- (c) *Not include policies which duplicate, substantively restate or are inconsistent with the content of national decision-making policies, unless directed by other policies in this Framework"*

4. This consultation response has been prepared based on the new NPPF 2026, its SDS tests of soundness and the new NDMPs.
5. We look forward to being an active participant in the DNLP Examination in Public (EiP), on behalf of the London business community, in respect of the issues we raise in this consultation response.

EXECUTIVE SUMMARY AND CUMULATIVE IMPACT

6. The DNLP represents positive progress for strategic planning in London on several fronts. The streamlined document is generally set out in a more logical and legible format than the current London Plan, published in 2021. Our comments largely focus on specific policy wording and recommendations that would improve the Plan's effectiveness and the deliverability of development in the capital.
7. In the Mayor's opening justification, "*Setting the target*" in Chapter 1 at paragraph 1.13, "*viability*" is quoted as a key driver for the strategic 10-year housing target being set at the lower level of 558,000 net new homes to ensure the Plan remains realistic and deliverable.
8. Acknowledging the challenging economic conditions facing the industry, the DNLP has tried to reduce the cost burden placed on development by removing some existing policies (e.g. carbon offsetting contributions). However, new cost burdens have been introduced through planning gain requirements (e.g. London-wide demands for affordable workspace in GLE7) and policies that go further than Building Regulation requirements (e.g. energy-efficiency standards in GHR1). It is therefore imperative that we understand this net impact of policy changes through the DNLP viability evidence – the London Plan Viability Study Phase 1 Report (July 2026) (the Viability Study Phase 1).
9. Our consultation response highlights a number of unrealistic assumptions that have been used as inputs for the Viability Study Phase 1. The Study also fails to take into account some of the new policy requirements that are expected to have the biggest impact on build costs, such as water, acoustics, carbon and energy efficiency.
10. In general terms, the DNLP is predicated on some very optimistic assumptions about the extent of market recovery expected in the short and medium term. These assumptions are not shared by market sentiment. They concern all types of development but are particularly pronounced in relation to housebuilding.
11. Even without all of the DNLP policies being viability tested, and notwithstanding its unrealistic assumptions, the Viability Study Phase 1 concludes that in the 989 development scenarios tested, only 23% would be viable under the base case scenario. In other words, a striking **77% of development scenarios are unviable**. This suggests that the new target for 558,000 homes over 10 years is impossible to achieve based on current DNLP policy requirements.
12. We understand that a Phase 2 Viability Study will be published in due course, following the conclusion of this DNLP consultation. We therefore reserve the right to provide further commentary on this crucial issue and wish to participate in relevant EiP hearing sessions. It will be crucial to the deliverability and soundness of this Plan for the Phase 2 Viability

Study to demonstrate how the strategic 10-year housing target of 558,000 net new homes has been reconciled with the cumulative costs of the Plan's policy requirements.

13. Turning to our key issues on specific policies, there should be a **stronger emphasis on economic growth** upfront in MBUL1 to support the Good Growth objective "*Growing London's economy in a way that benefits all*", and explicitly require the prioritisation of economic growth and housing delivery in the planning balance in instances where there are competing detailed policy requirements elsewhere in the Plan.
14. The proposed local plan-led **release of Green Belt** for new homes and industrial land at is supported. However, the Plan targets 10% of all new development to be delivered on Green Belt land, and it is questionable how realistic this is.
15. The clear and welcome **prioritisation of affordable housing provision and public transport improvements** in developer contributions in MBUL1 is not translated into the detailed policies that follow elsewhere in the DNLP. To avoid confusion, additional clarification is required throughout the Plan regarding the relative hierarchical weight to be afforded to competing developer contributions and cost burdens on development.
16. We have significant concerns regarding the approach to **optimising the use of land and site capacity** in MBUL2. We support the intention, but when read as a whole, it lacks ambition and clarity. In particular, we are concerned that the ambition for higher densities on strategic sites, and also on small sites, has been lost. We have suggested improvements to the Optimisation Framework, and we believe that a design-led approach remains the most effective means of making the best use of land, and it should be reinstated.
17. The approach to **Tall Buildings** is an improvement on the current London Plan; however, further changes are needed. The wording of MBUL3 needs to be made clearer that a tall building outside a designated cluster is permissible, provided it satisfies the location criteria provided. We also propose there should be a third category of building typology in MBUL3: Very Tall Buildings comprising 60 to 100 metres in height. This would ensure that the growth potential of the intermediate locations between Tall Building clusters and Metropolitan Tall Building clusters could be maximised in accordance with the GLA's Metropolitan Scale Tall Building Study.
18. On **affordable housing** (HN3), the boroughs should be discouraged from setting their own, higher targets, which would ultimately constrain, rather than increase, overall supply. Geographical variation in affordable housing targets is sensible; however, the draft targets currently presented for the three location bands are very ambitious and will mean that many schemes will need to follow the viability- tested route for some time. There is some concern about the risk of embedding any short-term targets in a 25-year spatial development strategy, and why it may be more appropriate for them to be included in London Plan Guidance, which can be more readily updated in response to market conditions.
19. If the DNLP is to be deliverable, and its housing targets are to be realistically achievable, an effective short-term policy intervention would be to have a moratorium on Mid and Late

Stage Reviews, as they remain the biggest single barrier to investment, and ultimately delivery, in London.

20. Turning to Chapter 4: *Growing London's Economy*, clearer support is needed in GLE1 to support the **office market** both in terms of making best use of existing stock and encouraging the supply of new office development.
21. We support the DNLP stance on the protection of **industrial land** and growth in industrial capacity driven by industrial intensification. It is vital that pressure to increase housing delivery, over and above the current DNLP housing target, does not result in a dilution of industrial protection policy or a reduction in the industrial intensification target.
22. The introduction of a dedicated **data centre** policy for the first time is welcome, recognising the important role they play in supporting London's growth, digital economy and international competitiveness. Collectively, the policies on waste, the circular economy, and access to employment and skills must remain proportionate and focused on what development can realistically deliver given the challenging economic backdrop.
23. **Affordable workspace** remains a key area of concern for us. GLE7 goes further than the current London Plan, and there is no justification to state that every LPA in London should be bringing forward an affordable workspace policy. It seems to have been drafted in isolation without due regard to other policy and developer contribution priorities in the DNLP. We do not support the inclusion of B8 storage and distribution uses being listed in the commercial proposals, and we are concerned about the checklist approach that LPAs are encouraged to follow. Where there is a genuine need for affordable workspace, backed up by robust market evidence, the option for off-site provision or payments in lieu is fully supported.
24. There have been some welcome improvements to the policy approach to creating a **greener, resilient and healthy city** compared with the current London Plan. The move to a more technology-agnostic approach to low-cost and low-carbon heat is particularly welcome. The key issue with Chapter 5 is to understand the net impact of the chapter as a whole in balancing sustainability objectives against development viability and deliverability, particularly on the issues where the DNLP goes beyond national policy and Building Regulations, including through its requirements for energy efficiency, overheating and whole life-cycle carbon.
25. The refreshed approach to the **Central Activities Zone (CAZ)** is welcome, and we support the proposed CAZ strategic functions. Some minor text amendments are needed to ensure a consistent approach to residential development in the CAZ. We support the repositioning of the West End International Centre designation and the principle of the CAZ Transformational Gateways.

COMMENTS ON DRAFT POLICIES

26. Below, we provide a chapter-by-chapter detailed commentary on the DNLP policies that are relevant to our interests, by answering the consultation question for each policy:

“Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?”

27. As confirmed above, we have considered each policy against the four tests of soundness set out in Policy PM14(2) of the NPPF 2026. In summary, a sound SDS should be:
- a. *positive;*
 - b. *appropriate;*
 - c. *effective; and*
 - d. *consistent with national policy.*

28. Where relevant, at the end of each chapter sub-section, we also provide a general summary of overarching themes, particularly where it is important to consider the cumulative impact of that chapter in the round.

CHAPTER 2: MAKING BEST USE OF LAND AND ACHIEVING GOOD GROWTH

MBUL1: Spatial strategy

29. The final version of the Plan will need to be updated to cover a period of at least 25 years. This is to comply with policy PM1 “Spatial development strategies” of the new NPPF. This will have a number of knock-on impacts.
30. In principle, the overarching spatial strategy is supported, as is the approach to the broad locations for growth (BLGs). There are now 89 designated BLGs across London, which is a vast number and a significant increase from the number designated in the current London Plan, but the distinction between different BLG types is clear and comprehensive. It would be helpful if the final version of MBUL1, and its implementation text, defined the Mayor’s interpretation of a “strategic site” in the London context and in relation to the BLGs. This should go further than the short definition currently provided in the Glossary. The definition should recognise the unique nature of strategic sites, their critical importance to the DNLP’s growth targets, and the flexibility needed to deliver long-term, multi-phased projects that often require significant investment in infrastructure. This additional clarification is important in terms of the relationship between the Plan and the new NPPF, which relies heavily on “strategic site” references, and in particular NPPF policy HO13: *Build out of residential and strategic sites*.
31. The rationale for setting a strategic 10-year housing target of 558,000 net new homes is understood. This must not be an arbitrary target, but one that can be realistically achieved through the policies set out in the new Plan.
32. However, as currently worded, MBUL1 is not considered to be adequately positive or effective in its support of the Good Growth objective “*Growing London’s economy in a way*

that benefits all". To improve the soundness of MBUL1, and its direct link back to this Good Growth objective, a more assertive ambition should be inserted into Part A about economic growth and the need to prioritise this in the planning balance, particularly where there may be competing detailed policy requirements elsewhere in the Plan. Analysis by The Productivity Institute shows that in London annual productivity growth is now lagging many other major UK cities. Furthermore, earlier this year The London Datastore highlighted that London's overall unemployment rate had risen to between 6.1% and 7.5%, remaining consistently higher than the rest of England (4.2%) and the UK average (4.9%), with young people hardest hit by the labour market slowdown. The London Plan has an important role to play in reversing these trends.

33. To address this, **a new policy criterion** should be inserted into **MBUL1 A** as follows, potentially between existing (2) and (3):

give substantial weight to housing delivery (including affordable housing) and economic growth when weighing the planning balance of any conflicting policy objectives in both local plan viability assessments and development management decisions

34. The prioritisation of affordable housing provision and public transport improvements in **developer contributions** at MBUL1 A(4) is appropriate and welcomed. However, this clear policy objective is not translated into the detailed policies that follow elsewhere in the draft Plan. For example, policy GLE7 says all boroughs "should" bring forward affordable workspace policies, thus suggesting that affordable workspace contributions outweigh public transport contributions, even in locations that do not have a market need for affordable workspace. A similar issue arises with GLE5 D, as currently worded, in respect of a mandatory re-provision of cultural space. Other examples include the cumulative financial impact of the housing design policies in Chapter 3 and MBUL10, as well as the energy, carbon and heat risk policies in Chapter 5, all of which carry additional cost burden on development in their attempts to go further than national planning policy and Building Regulations.
35. Where policies, such as these examples, seek developer contributions that add additional cost burdens on development, the DNLP needs to be clearer for applicants and decision-makers on the relative hierarchical weight to be afforded to different competing contributions, particularly when development viability is constrained. This clarification would ensure MBUL1 A(4) is also positive and effective. We therefore propose that **MBUL1 A(4)** be updated as follows:

"prioritise affordable housing provision and public transport improvements in developer contributions where full compliance with all policy requirements is not viable or deliverable"

36. **MBUL1 B** sets out extensive instructions to the boroughs for their local plans to plan to deliver the new homes target, proportionate space for employment and appropriate infrastructure. As a general principle, MBUL1 B duplicates content found elsewhere in the Plan, making parts of the section unnecessarily repetitive. This is not appropriate, and it could be condensed.
37. The proposed local plan-led **release of Green Belt** for new homes and industrial land at **MBUL1 B(2)** is supported. The level of growth London requires cannot realistically be

achieved within the confines of its existing footprint, and this approach accords with government policy. However, the Plan targets 10% of all new development to be delivered on Green Belt land, and it is questionable how realistic this is. It is reliant upon the support of the Outer London boroughs containing Green Belt to formally allocate sites through their local plans, and some are already pushing back. It is therefore vital that the Mayor monitors relevant local plans and takes an interventionist approach where site allocations are not forthcoming to ensure that the spatial strategy, and its 10% target, can be delivered.

38. Strategic BLGs within the Green Belt are identified on the 10-year and indicative 20-year key diagrams (Figures 2.1 and 2.2), with delivery expected from year 4. Identification of the BLGs should not preclude smaller-scale release in other boroughs.
39. The need to designate **Brownfield Town Centres** (BTCs) on the two key diagrams accompanying MBUL1 is unclear, as there is no corresponding policy specifically relating to BTCs. Chapter 8 of the new NPPF sets out comprehensive national planning policies in respect of town centres, and MBUL1 A(1) of the DNLP already seeks to drive growth in accessible locations. It could therefore be reasonably appropriate, and consistent with national policy, to rely on these provisions and delete the BTC designations on the key diagrams to simplify them. Alternatively, a reference to BTCs could be included in MBUL1 B(1); however, we do not support designations without a clear purpose and need.

MBUL2: Optimising the use of land and site capacity

40. The overarching policy aim of MBUL2, *“to ensure development makes the best use of land and to make the most of all opportunities on brownfield land”*, is not adequately translated into the policy wording that follows. Neither does MBUL2 adequately reflect the ambition of the Good Growth objective “Making the best use of land” or MBUL1. Our view is that this part of the Plan requires significant reworking.
41. We support the intention, but when read as a whole, policy MBUL2 and box MBUL2 lack both ambition and clarity. In particular, we are concerned that the ambition for higher densities on strategic sites, and also on small sites, has been lost.
42. During the last London Plan review, the Density Matrix from previous iterations of the Plan was removed in favour of the design-led approach set out in current policy D3. The design-led approach sees density as an output and not as an input that should determine the form and type of new development.
43. When the current London Plan was examined, the Inspector concluded that dispensing with the Density Matrix was logical and justified as part of the overall design-led approach. Evidence submitted as part of the EiP process illustrated that about half of developments permitted since 2004 were outside the matrix ranges, thereby casting doubt over its effectiveness. Enforcing a strict upper limit on density runs the risk of inhibiting otherwise acceptable development, which would run contrary to the strategy of Good Growth.
44. We are therefore extremely concerned that the principle of optimising site capacity through a design-led approach has not been carried forward into the DNLP and it has instead reverted to a new iteration of the Density Matrix. Removal of the design-led approach is

also surprising given the GLA's Strategic Housing Land Availability Assessment (SHLAA) applies a design-led capacity (DLC) criterion in its methodology. Paragraphs 5.34 to 5.39 of the SHLAA explain the process of using DLC to estimate site capacities, and it notably states that, in 55% of cases, the DLC increased site capacity.

45. We believe that a design-led approach is ultimately the most effective means of making the best use of land. The principle should be reinstated in the DNLP, and it should be a planning requirement in MBUL2 to demonstrate how density has been optimised. The Optimisation Framework in Table 2.1, design codes, masterplans, and so on, can help set minimum expectations, but a design-led approach must fundamentally underpin how to optimise opportunities beyond those minimum expectations.
46. It is important to emphasise that the continued use of the term “optimising” should not be taken to mean there is a consistent understanding of its meaning across London. In the explanatory text for MBUL2 starting at paragraph 2.23, a new paragraph should be inserted to clearly define what is meant by “optimising the use of land” before introducing the detailed explanation of the Optimisation Framework.
47. For the reasons set out above, it is our view that this policy does not currently meet the tests of soundness. MBUL2 will not effectively achieve its policy aim. There is also a risk that the policy could have the unintended consequence of constraining well-considered, design-led density in areas where there is local opposition.
48. Upfront, **MBUL2 A** needs a much more ambitious framing in line with the new NPPF requirement for “*maximising the potential for growth*” (ref: the overarching objective of Chapter 4 of the NPPF) and “*[w]ithin settlements, development proposals for residential and mixed-use development should contribute to an increase in the density of the area in which they are situated*” (ref: policy L3 (2)(a) of the NPPF). The NPPF language implies increased ambition over the language of MBUL2, even though this may not be the DNLP's intention.
49. The wording of the main MBUL2 policy also needs to be tightened to make it much clearer that all references made to the “Optimisation Framework” specifically refer to the table of minimum densities provided in Box MBUL2 and that these only apply to the leftover sites that do not fall into categories (a) to (d) above. This is because a reader's eye is naturally drawn immediately to the table itself, making it easy to assume that the table applies more widely than intended.
50. We also suggest the following specific changes:
 - 1) **MBUL2 A(1)**: Reference should be made to “strategic sites” to ensure consistency with the language used in the new NPPF (and as defined in the NPPF glossary) and to differentiate from the leftover sites, beyond categories (a) to (d), that the Optimisation Framework should be applied to. This will also ensure that there is a clearer link with the various Broad Locations for Growth (BLGs) identified in MBUL1 and the accompanying key diagrams. MBUL2 A(1) should therefore include an explicit and purposeful ambition to maximise densities on strategic sites through a design-led approach.

- 2) **MBUL2 C(1)**: This part should also include reference to “strategic sites”, again for consistency with the new NPPF and to reinforce that the Optimisation Framework should only be used for the leftover sites not in categories (a) to (d) in Box MBUL2, and it should not be applied to strategic sites where densities should be maximised and design-led. It should also be stated here in MBUL2 C(1) that schemes which maximise housing delivery should be given substantial weight. A cross-reference could be provided to MBUL6 to ensure that policy’s aim, to maintain quality of life and place through good design, is weighed in the balance of maximising design-led density.
 - 3) **MBUL2 C(2)**: The introduction of a London Small Site Design Code could, in theory, set a clear, strategic policy framework for smaller sites, especially to support densification of the suburbs. However, the existence of this Design Code is inadequate on its own. MBUL2 C(2) needs to more explicitly reference the importance of small sites in delivering MBUL2 and state that the Design Code should be used to facilitate their optimisation.
 - 4) **Box MBUL2 opening section**: In respect of density ambitions for BFOAs, this text should not refer specifically to Opportunity Area Planning Frameworks (OAPFs) where densities should be optimised, but instead the need to maximise densities in BFOAs as a matter of principle, in case there is no OAPF in place.
51. Turning to the Optimisation Framework itself, set out in **Table 2.1**, the ranges provided for both storey heights and habitable room densities create confusion and are not consistent with national policy. The approach implies a defined lower limit and a defined upper limit for residential development in each setting/SAM combination, and this creates a real risk that some boroughs might apply the ranges rigidly, particularly where there is local opposition to densification. *(Note: commentary on the new Sustainable Access Measure (SAM) is provided in our “General comments on Chapter 2” section below on page 13).*
 52. In terms of its practical application, our members have cited numerous recent examples of planning permissions granted for sites of varying size and location across London that significantly exceed the upper density figure for their respective category in current Table 2.1.
 53. For these reasons, we propose the following changes to the Optimisation Framework set out in Table 2.1:
 - 1) The density ranges should be dropped and, instead, a single minimum density figure should be provided for each setting/SAM location.
 - 2) These density figures must then be more clearly expressed as absolute minima to be consistent with the new NPPF and ensure that development potential is maximised. Reliance on the footnote underneath Table 2.1, which states that “[i]t may be acceptable to exceed the heights and densities expressed in the table above”, is insufficient to address this issue. This should be reworded to encourage exceeding the minimum densities.

- 3) The building heights should be removed altogether. These have the greatest potential for unintended consequences by being used to obstruct well-considered, design-led density.
54. Fundamentally, while MBUL2 C(1) states that “*Residential development should achieve the minimum densities stated in the Optimisation Framework*”, there is no reference whatsoever to minimum or minima in Box MBUL2 itself (which is located on a separate page from the main policy); this needs to be addressed as a matter of priority. The preamble to Table 2.1 should clearly reference that the figures must be treated as minima and that densities should be optimised through a design-led approach, having regard to MBUL6.
55. Finally, the London Context Map in Figure 2.5, which accompanies MBUL2, suggests that the optimisation strategy in MBUL2 is highly dependent upon the densification of large swathes of “outer suburban” London with mid-rise development. In that regard, it is important to recognise that this typology is generally the most challenging to deliver in viability terms.
56. In conclusion, MBUL2 requires a significant overhaul to reinforce the importance of optimisation through a design-led approach. It should also be more clearly structured to redress the balance with strategic sites and small sites rather than placing too much emphasis on the Optimisation Framework for medium sites beyond categories (a) to (d).
57. If all of the changes we have suggested are implemented, policy MBUL2 and accompanying Box MBUL2 can be made more positive and more effective, and consistent with national policy. The changes are necessary to avoid endless debate about where and when it *may be* possible to exceed the heights and densities in the DNLP Optimisation Framework, as was the case under the density matrix in earlier versions of the London Plan, particularly where schemes were decided on appeal.

MBUL3: Tall buildings

58. Policy MBUL3 is an improvement on the current tall buildings policy (D9) in the London Plan 2021. We welcome the strengthened ambition in delivering tall buildings and metropolitan tall buildings, clearer definitions for both, and the streamlined design and locational criteria. However, some changes are required to improve the policy to make it more positive and effective.
59. Currently, in the plan-making section, **MBUL3 A(4)** suggests authorities should consider setting “*maximum*” building heights. Our view is that heights should be robustly determined by a design-led approach on a project-by-project basis. If boroughs are encouraged to set maximum upper limits, this may unnecessarily constrain the optimisation of a site, particularly where such limits are set by boroughs seeking to constrain building at height. This reference at MBUL3 A(4) should therefore be deleted.
60. In the development management section, **MBUL3 A(1)** begins by striking a somewhat negative tone, stating, “*Tall buildings should be directed to the locations that the plan-making authority has identified in the local plan as appropriate in principle for buildings of this height.*” This has created some uncertainty as to whether tall buildings are permissible

outside of designated clusters. There is concern that, currently, a borough or objector seeking to oppose a tall building proposal outside a designated location for a tall building cluster could rely on MBUL3 A(1) to support that position.

61. Following on from this, in the same development management section, **MBUL3 A(4)** could also be improved with more positive, proactive wording. Instead of the current approach that tall buildings “*should meet the following criteria....*” A more positive and effective opening statement to MBUL3 A(4) could be worded as follows:

Tall building proposals outside of identified locations should ensure they do not cause the following impacts...

62. It should be noted that this more positive framing would necessitate some changes to the wording of the criteria below.
63. Specifically in relation to criterion (x) in MBUL3 A(4), the specific requirement to address suicide risk should be directed to publicly accessible areas of tall buildings. Risks from accidental falls should continue to be addressed through the applicable Building Regulations and proportionate design measures.
64. Moving on to MBUL3 B, regarding any proposal for an isolated tall building, our view is that this should be deleted in its entirety. The first building in a tall buildings cluster will always be “isolated”, but it does not naturally follow that a new cluster in an appropriate location, such as an accessible town centre, should be resisted. MBUL3 already contains adequate safeguards to prevent an isolated tall building from coming forward in an inappropriate location. Instead, the policy wording should make clear that a tall building outside a designated cluster is permissible provided it satisfies the location criteria in Box MBUL3.
65. We propose there should be a third category of building typology in MBUL3: **very tall buildings**. The GLA’s evidence base for MBUL3, the Metropolitan Scale Tall Building study (Urban Initiatives, 2026), assesses 30 candidate locations. The assessment methodology includes a category called “very tall buildings”. This should be carried forward into MBUL3.
66. This new tall building typology would effectively be a “medium height” intermediary tall building that sits between tall buildings and metropolitan tall buildings, bridging the significant gap between the current minimum height thresholds of 30 metres and 100 metres respectively. We agree with the Urban Initiatives definition that a very tall building should comprise 60 to 100 metres in height.
67. The Metropolitan Scale Tall Building Study assesses the 30 candidate locations and narrows them down to a list of 17 metropolitan tall building locations identified in Table 2.2 and Figure 2.8. Yet many of the 13 dismissed candidate locations have significant potential for height and growth that may not be fully realised by a standard tall building cluster designation. This is particularly concerning given the current draft wording of MBUL3 A(4) (plan-making), which suggests authorities should consider setting “maximum” building heights, as discussed above.

68. A new very tall buildings category would ensure that the growth potential of these intermediate locations could be maximised, and it could be easily introduced into MBUL3 using the existing findings of the Metropolitan Scale Tall Building Study.
69. The DNLP consultation response submitted by the Earls Court Development Company includes a “Very Tall Buildings Analysis” that identifies emerging very tall building proposals that are being brought forward that are close to, or exceed, metropolitan tall building heights, but are located outside the 17 designated metropolitan tall building clusters. This is clearly a London-wide issue that BusinessLDN would like to draw attention to. In addition to Earls Court, there are numerous missed opportunities across London from Wembley to Ilford to the Lower Lea Valley. In particular, there are several very tall building proposals outside of a metropolitan tall building cluster in the Inner London boroughs south of the river, including Wandsworth and Lambeth.

MBUL4: Utilities – capacity, connectivity, and resilience

70. We welcome the emphasis on utilities upfront in Chapter 2, recognising the importance of an integrated and planned approach to energy, water and sewerage, and digital infrastructure as “the backbone for enabling Good Growth in London”.
71. The overall approach to MBUL4 is supported, along with the recognition that infrastructure capacity, connectivity and resilience are fundamental to delivering London’s growth. A strategic, London-wide approach is particularly important given that utility networks operate across borough boundaries and, in some cases, the infrastructure required to support London’s growth is located outside Greater London.
72. The relationship between MBUL4 and NPPF Policy W1 should be clarified, particularly around the respective responsibilities of plan-makers, infrastructure providers and individual developments. The policy should distinguish between strategic infrastructure requirements that should be addressed through infrastructure planning and investment, and development-specific impacts that can reasonably be addressed through planning obligations. Individual developments should not be expected to resolve wider network constraints outside of their control.
73. The Plan should also recognise that infrastructure required to support London’s growth and resilience will sometimes be located outside Greater London but can have a direct and significant impact on the capital. This should be reflected in the strategic planning approach and engagement with neighbouring authorities and infrastructure providers.
74. On water resources, the new Plan should recognise the importance of managing demand alongside supply. Evidence that new developments currently use more than 140 litres per person per day highlights the importance of improving water efficiency and long-term water resilience. This should be achieved through the effective use of existing resources, without introducing additional regulation or burdens on developers.
75. The specific reference to “Notices to Quit” at paragraphs 2.66 and 2.73 within the supporting text to MBUL4 is also welcome, recognising that the loss of existing digital infrastructure can have implications for the continuity and resilience of services for Londoners and businesses.

MBUL5: Sustainable transport to enable London's growth

76. We support the ambition to improve sustainable transport in all its forms, including rail, tram, river and bus operations, walking and cycling. It is essential that transport infrastructure keeps pace with London's growth. However, the link – and cross-referencing – between plan-making in **MBUL5 A** and Annex D ("Transport Interventions") needs to be improved. MBUL5 A should refer specifically to **Annex D Table D1** ("Major Transport Interventions"), not Annex D in general terms. In this regard, it is important to note that not all of the transport interventions set out in Annex D more broadly need to be plan-led in local plans as currently stated in MBUL5 A. Some, such as upgrading of rolling stock and international rail expansion, can come forward outside of the planning regime. This point should also be covered in **Box MBUL5** to ensure that such interventions are not dependent on being brought forward in local plans.
77. MBUL5 B should recognise that transport interventions may need to be funded through a combination of developer contributions, CIL and public funding. Planning obligations should remain proportionate to the impacts of individual developments and should not be used to require individual schemes to fund strategic transport infrastructure that serves a wider area or goes beyond the impacts of the development. This is particularly important given the cumulative cost of planning obligations and other infrastructure requirements already placed on development.
78. Strategic transport infrastructure should also make greater use of alternative funding and financing mechanisms that can capture the wider value created by new infrastructure. Our report with WSP, [Generating Land Value to Grow London](#), highlighted the potential for Tax Increment Financing (TIF), including a new residential TIF model, to use a proportion of future tax revenues generated by development unlocked by new transport infrastructure to help fund upfront investment. The London Plan should therefore support a broader approach to infrastructure funding, rather than increasing reliance on individual developments.
79. MBUL5 should also provide greater clarity on how the proposed approach aligns with the Mayor's freight strategy and supports the viability and deliverability of new development. The principle of land swaps, and the more efficient use of industrial land through intensification, is broadly supported; however, where industrial uses are relocated to more peripheral locations, consideration should be given to the implications for freight movements and vehicular access. The Plan should therefore consider the practical freight and parking requirements of Outer London industrial sites, alongside the wider approach to reducing car dependency, to ensure these policies can work effectively together.

General comments on Chapter 2

80. The spatial strategy in Chapter 2 of the DNLP is based upon a new **Sustainable Access Measure** (SAM). This is particularly relevant to the strategy for Green Belt release (MBUL1 and PV5) and the Optimisation Framework (MBUL2).
81. We recognise that SAM is a significant development in transport planning, shifting the focus from transport provision to how easily people can access jobs, services and opportunities. However, its complexity may make it difficult to interpret and apply

consistently, so clear guidance from the GLA and TfL will be important. While SAM can help identify opportunities to optimise Good Growth, it should not be the main factor determining development density or site suitability. Decisions should also take account of each site's individual characteristics and wider planning considerations. SAM will also need to be regularly updated to reflect changes in transport and accessibility. The GLA and TfL should clarify how SAM will be used alongside the Department for Transport's Connectivity Tool, how cycling is taken into account, whether detailed scores will be published alongside bandings, and how the model will inform planning decisions. Access to the underlying data and clear guidance will be important to ensure SAM is used consistently and fairly across London.

CHAPTER 3: DELIVERING THE HOMES AND NEIGHBOURHOODS LONDONERS NEED

HN1: Increasing London's housing stock

82. In the Mayor's opening justification, "*Setting the target*" in Chapter 1 at paragraph 1.13, "*viability*" is quoted as a key driver for the strategic 10-year housing target being set at the lower level of 558,000 net new homes to ensure the Plan remains realistic and deliverable. Yet the DNLP makes some ambitious assumptions about the rate of market recovery anticipated for housebuilding. This applies both in the short term, while this London Plan review is completed, and also in the medium term, during the initial 10-year period of the Plan's timeframe.
83. According to Moliur, around 15,400 private homes were completed in London in the 12 months to Q1 2026, around 25% below the previous 10-year average. Against the DNLP target of 55,800 homes per annum, delivery would need to increase by around 40,400 homes each year, or 262%, to reach the new annual target. This would represent a significant step change.
84. The viability evidence published alongside the DNLP, the *London Plan Viability Study Phase 1 Report (July 2026)* (the Viability Study Phase 1), is critical to understanding whether this step change is realistically achievable. In fact, the Viability Study Phase 1 raises serious questions about the cumulative impact of the DNLP's policies on its deliverability and whether the Plan can meet the tests of soundness.
85. The Viability Study Phase 1 tests 989 development scenarios; however, the study fails to take into account some of the new policy requirements that are expected to have the biggest impact on build costs, such as water, acoustics, carbon and energy efficiency.
86. The methodology also assumes that there will be an 80% reduction in Borough CIL. This is driven by the time-limited Emergency Measures for Housebuilding, which allow up to 80% CIL relief on schemes that deliver 35% affordable housing. This is a wholly unrealistic assumption given the number of schemes that have been able to utilise the Emergency Measures over the past 12 months (at the time of writing, no planning permissions have yet been issued) and the extent of complexity and conditionality set out in the Ministry of Housing, Communities & Local Government's recent consultation on "*Proposed Regulations for a Time-Limited Relief from the Community Infrastructure Levy in London*".

87. Furthermore, the viability methodology assumes a 10-year housing sales growth of over 4.5% per annum, including on affordable housing. This is a highly ambitious assumption on private, for-sale housing and is not supported by the current market. This will need to be interrogated during the EiP.
88. Even without all of the DNLP policies being viability tested, and despite reliance on an unrealistic assumption about CIL relief, the Viability Study Phase 1 concludes that in the 989 development scenarios tested, **only 23%** would be viable under the base case scenario. In other words, some 77% of development scenarios are unviable. This suggests that the new target for 558,000 homes over 10 years is impossible to achieve based on current DNLP policy requirements.
89. We therefore have significant concerns that the assumptions made about the rate and timescales for market recovery are overly optimistic and risk undermining the soundness of the Plan. The extent of market recovery, and the Plan's viability assumptions, will therefore need to be carefully considered at the EiP in 2027.
90. Finally, we welcome the confirmation at paragraphs 3.18 and 3.19 in the implementation text for HN1 that Purpose-built Student Accommodation (PBSA) and non-self-contained accommodation (NSC) for older people should count towards meeting LPA housing targets and the ratios for calculating each. This clarification is supported and must be retained in the final version of the Plan.

HN2: Protecting and reshaping housing

91. In proposals that involve the demolition and replacement of existing affordable homes, the need to maximise the provision of additional affordable housing is understood and supported. However, the requirement at HN2 C(3) to provide 50% of the additional housing as affordable in order to follow the Fast Track Route through planning is wholly unrealistic and will significantly impact delivery. Instead, the policy expectation should align with the Threshold Approach in HN3.
92. These projects are among the most challenging to unlock and need a more positive policy framework. Applying a 50% requirement on top of the reprovion element places such schemes at a huge disadvantage compared with privately owned sites. The 50% target does not adequately reflect the substantial embedded costs in these types of sites, including the costs of decanting residents, leaseholder acquisition, replacement housing, resident commitments and complex phasing.

HN3: Delivering affordable housing

93. As stated above under HN1, the Mayor cites viability as a key driver for the strategic 10-year housing target being set at the lower level of 558,000 net new homes to ensure the Plan remains realistic and deliverable (ref: Chapter 1, paragraph 1.13). Yet the DNLP makes some optimistic assumptions about the rate of market recovery for housebuilding, and this directly impacts policy HN3 and its expectations for affordable housing delivery.

94. Given the severity of current market conditions, it is welcome that the DNLP proposes – in theory – a transitional arrangement for the Threshold Approach: the “location bands” set out in policy HN3 C and its accompanying map at figure 3.2. This policy rightly anticipates that further policy support will be needed to support housebuilding when the Emergency Measures expire in 2028. However, the delivery and soundness of the DNLP will depend on any improvement in market conditions being supported over time by a policy framework that enables recovery. This will be essential if HN3’s longer-term ambition is to be realised to return to a blanket 35% affordable housing target on all private land. This policy should be viewed as a process over time rather than a one-off intervention. If pursued too rapidly, it risks constraining recovery in London’s housing market.
95. It is in this context that **HN3 A** on plan-making should include a clear direction to the boroughs for their local plans to be in general conformity with the London Plan on affordable housing targets and the Threshold Approach. The boroughs should be discouraged from setting their own, higher targets, which would ultimately constrain, rather than increase, overall supply and therefore the supply of affordable homes.
96. In this regard, the implementation text for HN3 at **paragraph 3.40** is extremely unhelpful and risks making the approach in HN3 unsound. While the ambition for London to get back to achieving a blanket 35% affordable housing on all private land longer term is positive, the wording designed to allow for this at 3.40 risks giving the boroughs that have been pushing for higher than 35% targets a basis for disregarding the transitional targets and pursuing unrealistic policy expectations, thus reducing overall delivery.
97. Paragraph 3.40 should be deleted and at **HN3 A(3)** the following insertion should be made:
- “should follow the Threshold Approach to Planning Applications as set out in the development management section of this policy for referable and non-referable planning applications and only bring forward local policies and targets where their deliverability is justified by robust viability evidence”*
98. Turning to the “location band” approach in **HN3 C**, and the accompanying map at figure 3.2, it is welcome in principle that the DNLP recognises there are geographical variations in viability conditions across the capital. However, at the time of writing in October 2026, housing development in the majority of London boroughs is not viable. Furthermore, the Emergency Measures for Housebuilding were announced 12 months ago and, while a number of schemes are in negotiation to use them, not a single planning permission has yet been issued. Therefore, the Mayor must be clear in his messaging to the boroughs that any transitional arrangement must take a medium-term approach. This will not be a short-term fix.
99. In this context, the Examination of the DNLP will need to consider whether the location band approach in HN3 (C), and in particular the accompanying percentage targets for each location band in **Table 3.2**, are appropriate. The draft targets currently presented are ambitious and must be backed up by credible viability evidence. In particular, maintaining the 35% affordable housing requirement for location band A (the central and inner London boroughs plus Richmond upon Thames) as soon as 2028 is very optimistic. If this approach is carried forward, it must be accepted that many schemes will need to follow the viability-tested route for some time, and viability testing should not be framed as a

negative option. Any reviews imposed must be based on commercial terms and reflective of risk.

100. There is also a growing argument that, since the DNLP location bands and their targets were conceived and published for consultation, there have already been geographical changes in the market in terms of the amount of affordable housing that may realistically be achievable. The outer boroughs in location bands B and C will take the greatest benefit from the Government's recently announced Your First Home initiative and grant funding availability, while viability conditions in Central London (band A) have become even more challenging due to high Existing Use Values, build costs and a greater price gap between market housing and affordable housing. This highlights the risk of embedding any short- or medium-term targets in a 25-year spatial development strategy, and why it may be more appropriate for them to be included in London Plan Guidance, which can be more readily updated in response to market conditions.
101. For housing proposals on land released from the **Green Belt**, HN3 C sets an affordable housing target of 50% for all schemes of 10 homes or more, unless significant transport infrastructure delivery is proposed. In this regard, it is important to highlight that the Viability Study Phase 1 evidence assumes a nil premium above Existing Use Value for any development on Green Belt land. This means the GLA's viability evidence is predicated on developers acquiring Green Belt land at its current value without the landowner seeking any additional premium for its development potential. This is not a realistic assumption. Landowners must be incentivised to sell their land in the first instance, and they will expect to receive a premium for doing so. This should therefore be reflected in the GLA's viability appraisal.
102. If the GLA's Viability Study Phase 2, expected to be published prior to the EiP, is not updated to address this issue, the inevitable landowner's premium on a site will impact the ability of any scheme to meet the 50% target and the other policy requirements for Green Belt development elsewhere in the DNLP, most notably PV7. Proceeding with the DNLP as currently drafted, and assuming that no premium is payable to landowners, will call into question whether any Green Belt sites will actually come forward for development. Given the spatial strategy is predicated on 10% of all new development being delivered on Green Belt land, including 56,100 new homes, this raises a significant issue for the soundness of the Plan.
103. More positively, at HN3 C and in **Table 3.2**, setting the affordable target for housing on industrial land at 35% (instead of the current London Plan target of 50%) is welcomed.
104. Turning to **Table 3.3** in HN3 C, the blanket 20% affordable housing target for medium-sized schemes on private land is welcomed and supported. However, it is proposed that the definition of a medium-sized scheme should be changed from 10–35 homes to **10–50 homes**. The Optimisation Framework in MBUL2 is highly dependent on densification of outer suburban London with mid-rise development, yet this typology is generally the most challenging to deliver in viability terms. Therefore, a consistent policy approach to target 20% affordable housing on medium-sized schemes of up to 50 dwellings will encourage increased SME development activity and support Registered Providers.
105. The prioritisation of intermediate housing for **key workers**, and the requirement for LPAs to proactively plan for this tenure in HN3 A, is welcomed and supported.

106. In respect of the DNLP approach to affordable housing for **Build to Rent (BtR)** developments at **HN3 D(3)**, it is important to note that the GLA's Viability Study Phase 1 evidence does not provide sufficient detail on how BtR performs under the DNLP policies. BtR operates under a different financial model to build for sale, meaning that policy costs can have a different impact on the value of a scheme and the price that can be paid for land. The supporting viability assessment shows only 15 of 115 BtR scenarios as viable, and as explained under HN1 above, this is based on assumptions that do not fully reflect current market conditions. Particularly in relation to BtR, the assumed prime yields of 3.75 to 4.1% appear lower than those being seen in the current market, with stabilised BtR assets reportedly trading at around 5% and some not selling even at this level. The viability evidence should therefore be updated to ensure it provides a robust viability assessment based upon current BtR market conditions.
107. **HN3 L** in respect of affordable housing for **PBSA** allows for PBSA schemes to provide on-site conventional affordable housing at the relevant percentages set out in Table 3.2. However, it is unclear how on-site conventional affordable housing should be calculated for PBSA schemes. Paragraph 3.42 provides guidance on how to measure affordable housing in market sale and BtR scenarios, with habitable rooms being the expected measure, and in some cases habitable floorspace. It should be updated to explain how to measure affordable housing in PBSA and Large-scale Purpose-built Shared Living (LSPBSL) schemes.
108. Linked to this, we are concerned about the provision in **paragraph 3.44** regarding the calculation of a payment in lieu (PIL) of affordable housing for a PBSA scheme. The method proposed is effectively a Gross Development Value-based approach, which is unreasonably onerous. Instead, a PIL for PBSA should directly reflect the cost of providing on-site affordable student accommodation. Paragraph 3.44 also requires the PIL calculation to be based on the amount of Net Internal Area (NIA) floorspace, which includes all of the shared amenity space as well as the self-contained living accommodation. As currently worded, paragraph 3.44 would therefore have a detrimental impact on the viability of PBSA schemes and constrain delivery and planning gain. It is vital that the DNLP supports a strong pipeline of PBSA units to maintain the competitiveness of London's higher education institutions compared with their global peers.
109. **HN3 M** in respect of affordable housing for **Large-scale Purpose-built Shared Living (LSPBSL)** schemes currently contains no route to provide a policy-compliant affordable housing contribution. The current London Plan explicitly refers to 35% of the units at a 50% discount to market rent. This should be reviewed.
110. **Paragraph 3.45**, which deals with calculating a PIL for LSPBSL schemes, refers to the PIL typically being an upfront payment to the LPA. This causes problems for cash flow and thus the overall viability of a scheme and its ability to deliver other planning gain. Phased payments would be more appropriate and better reflect established practice, whereby affordable housing is delivered in phases linked to occupation thresholds. Paragraph 3.45 should therefore be updated as follows:

"For Large-scale Purpose-built Shared-living Accommodation, payment-in-lieu of affordable housing ~~is expected to typically~~ can be provided as an upfront payment ~~to~~ or a phased payment to be agreed on a site-by-site basis with the LPA..."

111. It is also not clear what is being referred to by *“the Mayor’s Affordable Housing guidance”* at paragraph 3.45. The Plan should not reference guidance that is not yet in existence.
112. We also have concerns regarding the inputs used for LSPBSL schemes in the GLA’s Viability Study Phase 1, particularly in relation to the yields used, assuming capitalisation at practical completion, low operating costs and optimistic assumptions on the net to gross floorspace ratio.
113. Finally, in respect of LSPBSL schemes, discounted co-living accommodation should be an acceptable means of meeting affordable housing obligations. This could be aligned with the DNLP proposals for key working housing.
114. Turning to **estate regeneration** schemes, HN3’s position to introduce a Threshold Approach for affordable housing provision as part of these projects is welcomed. However, the requirement to deliver 50% of the additional housing as affordable will have a significant impact on delivery. Estate regeneration schemes are among the most challenging to unlock and need a more positive policy framework. Applying a 50% requirement on top of the reprovision element places such schemes at a huge disadvantage compared with privately owned sites. The 50% target in HN3 does not adequately reflect the substantial embedded costs in these types of sites, nor the key role they play in housing delivery and the number of homes they support.
115. Finally, the requirement at **HN3 N(4)** for schemes that follow the viability-tested route to undergo a **Late Stage Review** (LSR) has been carried forward into the DNLP despite consistent feedback from the industry that reviews remain the biggest single barrier to investment, and ultimately delivery. This also applies to Mid Term reviews on larger, multi-phase schemes (as per HN3 N(5)), which potentially have multiple delivery partners on different phases. When housebuilding is facing such stark economic challenges and development risk is heightened, investors need to be incentivised to take on this increased risk and commit to delivery.
116. The LSR mechanism can potentially transfer to the local authority a contingent share of the upside that funders would otherwise rely on as a risk margin, at precisely the stage of a project when that margin is most important in satisfying lending covenants and return requirements. In current market conditions, this uncertainty is disproportionately damaging, making the LSR liability far harder to price into funding terms at the outset.
117. Funders and investors find reviews extremely difficult to manage, and their use will continue to hold back delivery. This is particularly relevant at the current juncture in the market where general, speculative residential development is not viable in London.
118. If the DNLP is to be deliverable, and its housing targets realistically achievable, an impactful short-term policy intervention would be to have a moratorium on Mid and Late Stage Reviews. This could be conditional on the relevant project being substantially implemented within, say, two years of planning permission being issued (potentially longer for those projects needing to be reviewed by the Building Safety Regulator). The intervention could be in place for either a specified timeframe, which we would recommend should be at least seven years, or it could fall away after affordable housing completions reach a specified threshold linked to the GLA’s annual monitoring.

119. This policy intervention would help developers and their funders better manage development risk and allow projects that would otherwise not come forward to be financed and commenced. Helping to mitigate longer-term risk in this way would stimulate supply while the headwinds recede. A counter-argument might be that Londoners could miss out on affordable housing and other planning gain opportunities that could potentially be secured by a viability review process, but no benefits can be yielded from a scheme that is not implemented and homes that are not delivered.
120. In conclusion, the overarching aim for policy HN3, to ensure it meets the tests for soundness, should be to build in adequate flexibility to allow policy interventions and short- and medium-term transitional arrangements to positively support the recovery of housebuilding in London in a way that reflects actual market recovery.

HN5: Managing specialist accommodation

Purpose-built Student Accommodation (PBSA)

121. We support the principle of positively planning for PBSA. It plays a key role in London's overall housing supply. It also supports the higher education sector, particularly for those institutions seeking to expand in London, which is a substantial economic driver within the capital. A recent London Higher report shows London is the world's leading higher education city by scale, diversity and global influence. It is worth £60.9bn a year to the economy, and the sector directly and indirectly supports over 223,000 jobs across London.
122. We also welcome the decision to only apply PBSA nomination agreements to the affordable element of PBSA schemes (HN5 E).
123. However, we have reservations regarding the new approach to setting borough-level PBSA bedspace targets at **Table 3.6**. The 2021 London Plan deliberately avoided borough-level targets because student demand can change in response to university expansion and estate strategies, site availability and Government policy. The DNLP recognises this uncertainty and states in **paragraph 3.69** that the targets should be kept under review. At the very least, this paragraph must be retained in the final version of the Plan.
124. However, we believe the inclusion of Table 3.6 should be reviewed as a matter of principle during the EiP. It is currently not justified by robust evidence, and there are concerns about the assumptions underpinning projected demand and the fact that this could be understated. It should also be noted that, in the past, around 2,175 PBSA bedspaces have been delivered per annum in Inner London compared with around 820 in Outer London. The DNLP seeks to reverse this pattern through its borough allocations, despite the concentration of London's universities and student demand in Inner London.
125. If borough targets are carried forward, given the inevitable fluctuations in supply and demand for PBSA in different parts of London, it should be made clearer that the proposed targets should not be interpreted as a fixed cap on delivery because, as currently worded, there is a real risk that some boroughs may apply them as maximum limits and thus constrain London-wide delivery. They must not constrain universities' ability to grow.

126. HN5 and Table 3.6 need to provide the flexibility to respond to changing student demand and university plans and avoid the targets inadvertently constraining PBSA delivery where there is demonstrable need. Fundamentally, specialist housing should be market-led, and PBSA supply should be able to respond to demand. Students should be able to choose their accommodation and where to live based on their personal needs rather than being geographically constrained to one area or another.

127. To address these points, policy **HN5 A(1)** should be updated as follows:

“seek to meet the need for PBSA, identifying positive opportunities for its contribution to local and strategic objectives, allocating sites for a level of provision that will ~~satisfy~~ meet and exceed targets in Table 3.6”

128. It should also be noted that it is unclear from the evidence base published alongside the DNLP how the figures in **Table 3.6** have been established. Furthermore, the **heading of column 2** in Table 3.6 should be amended as follows:

“PBSA Target (minimum bedspaces)”

Large-scale Purpose-built Shared Living (LSPBSL)

129. At **HN5 A(2)**, we do not agree with the coupling of PBSA and LSPBSL in terms of references to spatial concentration. The harm arising from the concentration of such uses is not understood. While PBSA is transitory in nature because students have defined periods of education, LSPBSL provides longer-term housing for residents who wish to settle and contribute to existing neighbourhoods and communities over the longer term.

Older Persons’ Accommodation

130. We support the principle of planning positively for Older Persons’ Accommodation as per **HN5 A(3)**.

131. As stated above under policy HN1, we welcome the clarification in paragraph 3.19 that non-self-contained accommodation (NSC) for older people should count towards meeting housing targets based on a 1:1 ratio. However, further clarification is consequently needed in policy HN5 in **Parts B, G and H** that housing for older people should be allowed on sites identified for housing.

132. In the implementation text for HN5, at **paragraph 3.77**, it would be helpful to clarify that private housing for sale and rent for older persons should still be dealt with under the remit of Policy HN5.

HN6: Built to rent

133. We welcome the support for Build to Rent (BtR) in HN6 and its recognition of the role the sector can play in diversifying London’s housing supply. However, the policy should be more positively framed to support BtR delivery, particularly given the significant decline in

new starts. Recent research showed only 613 BtR homes started construction in London in 2025, an 80% fall compared with 2024.

134. The following minor amendment to the opening sentence of **HN6 A** would indicate a stronger policy ambition and the need for proactive action:

“Plan-making authorities should ~~take a~~ positively approach to plan for BtR development and its role in meeting the housing targets set out in policy HN1...”

135. **HN6 B(4)** refers to the acceptable affordable tenures for BtR, namely discounted market rent and Key Worker Living Rent (KWLR). Experience with BtR providers is that intermediate affordable products in BtR schemes are given limited weight by some LPAs in London. If the Mayor wants to see more intermediate BtR housing delivered, then HN6 B(4) needs to give it further weight.
136. At present, KWLR homes are loss-making, and the grant position is unclear. Even if grant is achieved, the rates are substantially less than social rent, and it could make the delivery of KWLR less appealing than delivering social rent in line with Table 3.2. In this context, the inter-relationship between HN3 and HN6 should be reviewed to be more closely aligned, and HN6 B(4) should include an “either”, “or”, or “hybrid” approach to the delivery of affordable tenures.
137. The implementation text below HN6 could also be expanded to include a new, additional paragraph setting out where KWLR should be accepted, particularly on constrained or single-tower sites where the delivery of traditional affordable housing in a separate building or core is prohibitive to bringing the scheme forward. It should also reference the potential for inclusion of a PIL as part of the affordable housing package where on-site provision is challenging and a PIL would maximise overall affordable housing delivery.

HN7: Housing size mix

138. It is important that LPAs do not bring forward prescriptive dwelling mix requirements for market homes in their local plans which prevent developers from responding to local supply and demand trends in the market. For this reason, HN7 B should be removed in its entirety.

HN8: Housing design

139. We do not consider that **HN8 A(1)**, as currently drafted, sets out a clear position on policy expectations for dual-aspect and single-aspect dwellings. It should be reviewed, in parallel with accompanying paragraph 3.99.
140. **HN8 A(4)** concerning the activation of ground-floor frontages is also unclear. This issue should be design-led according to the site circumstances and proposed building typology. It is not necessarily always the case that ground floor activation results in better residential quality. Indeed, in some circumstances, internal access can result in improved residential amenity through improved internal light conditions and increased outdoor amenity space at

ground floor level. HN8 A(4) should either be deleted or it should be qualified with the insertion of “where appropriate”.

141. It is proposed that at **HN8 B(2)** the 75% requirement should relate to the number of habitable rooms rather than gross internal area floorspace.
142. Finally, **HN8 B(4)** concerning private outside space should not encourage LPAs to set their own standards in local plans.

HN9: Accessible housing

143. We question the rationale for **HN9 A(1)** requiring at least 10 per cent of affordable homes to be delivered as “wheelchair-accessible dwellings”. This is not backed up by the evidence provided in the Strategic Housing Market Assessment and should be deleted.
144. Instead, HN9 should rely on the provision in the current London Plan for at least 10 per cent of homes of all tenures to be delivered as “wheelchair-*adaptable* dwellings”.
145. Finally, **Table 3.8** accompanying HN9 should be deleted. Building Regulations already set out the additional space requirements for wheelchair-user dwellings, and inclusion in the DNLP is unnecessary.

General comments on Chapter 3

146. In relation to the overall approach to Chapter 3, we have set out a number of concerns regarding the assumptions that have been made about the extent of market recovery that is anticipated – both in the short term, during the completion of this London Plan review, and then over the medium term, during the initial 10-year period of the Plan’s timeframe.
147. Linked to this, we have highlighted several specific concerns about unrealistic assumptions used for the London Plan Viability Study Phase 1 Report (July 2026) (the Viability Study Phase 1). These undermine the credibility of the viability evidence that justifies the DNLP approach. We have highlighted unrealistic inputs in respect of most housing types.
148. The unrealistic assumptions, coupled with the fact that not all of the DNLP policies have yet been viability tested, together raise serious questions about the cumulative impact of the DNLP’s policies on its deliverability and whether the Plan can meet the tests of soundness. This suggests that the new target for 558,000 homes over 10 years is impossible to achieve based on current DNLP policy requirements.
149. A Phase 2 Viability Study has been promised, and we look forward to engaging on this issue during the EiP process, when more information is available, and we are better informed on the rate of market recovery over the second half of 2026 and into 2027.

CHAPTER 4: GROWING LONDON'S ECONOMY

GLE1: Sufficient and appropriate employment space

150. GLE1 contains no specific reference to office provision, despite the vital role that offices play in London's economy across the whole of London. A recent report by the London Property Alliance demonstrated that office-based sectors in London support around 2.8 million jobs and generate close to £290bn in GVA each year, while the City of London alone contributes almost 5% of UK GVA. However, office supply is increasingly constrained, with 14 million sq ft of office space lost from the CAZ between 2018 and 2023 and a projected shortfall of almost 11 million sq ft over the next five years. Given the importance of offices to London's productivity and the wider UK economy, the DNLP should provide explicit policy support for the delivery and renewal of high-quality office space in GLE1.

151. Yet the DNLP seems to be predicated on the assumption that the supply of new office floorspace will continue on a "business as usual" basis, and this is concerning. Clearer ambition is needed, through proactive and assertive language, to support the office market both in terms of making best use of existing stock and encouraging the supply of new office development. While **GLE1 B** refers to Class E uses in general terms, it is recommended that a specific reference should be made to the supply of office space given the integral role it needs to play in London's economic growth. A new policy criterion should be inserted into GLE1 between existing (B) and (C):

Within Class E, substantial weight should be afforded to maintaining a strong supply of high-quality office floorspace. This should include a range of new office provision in the CAZ and town centres and effective use of existing stock through either refurbishment or change of use of surplus space in accordance with PV3.

152. **GLE1 F** is neither appropriate nor consistent with national policy and should be deleted. It is a development management policy and fails to meet the requirements of the new NPPF for an SDS policy.

153. If any borough considers it has a local need for this type of policy, backed up by robust market evidence, they should bring forward their own local plan development management policy. However, it should be noted that this type of policy approach has been proven to compromise redevelopment schemes on projects in the boroughs of Hackney and Southwark. There is also a risk of unintended consequences where existing occupiers are able to exert disproportionate influence over the redevelopment process. Problems can also arise from the type of accommodation in the replacement scheme, for example where surplus commercial space is proposed to be redeveloped as a last-mile logistics hub. In most cases, lower-cost space will be re-provided by the market without the need for policy intervention. Where there is a more acute need, supported by robust evidence, this is covered by the affordable workspace policy (GLE7).

154. Notwithstanding our position that GLE1 F should be deleted from the Plan in its entirety, if it is retained, it should be reworked based upon the following principles:

- 1) the CAZ should be excluded; and
- 2) the policy requirement should be to provide existing tenants a time-limited option to stay on site as opposed to mandatory re-provision or relocation.

GLE2: Supply of industrial land

155. We support the DNLP's overarching objective to maintain strong policy protection of industrial land alongside strategic land swaps, as discussed above under MBUL1. This approach would release some well-connected industrial land for housing while re-providing modern accommodation on sites released from the Green Belt. Industrial land is essential economic infrastructure, supporting London's businesses, communities and economic growth. The Plan must therefore protect overall industrial capacity while promoting intensification, ensuring that additional housing pressures do not undermine industrial land protections or the commitment to make more efficient use of existing sites. These changes must be carefully managed in partnership with boroughs and relevant landowners to ensure they deliver a more sustainable outcome overall.
156. There is a clear directive in GLE2 for LPAs to plan positively to maintain sufficient industrial capacity, and to compensate for any SIL or LSIS release, by designating a net additional 270 hectares for industry and logistics and supporting industrial intensification. A more strategic, pan-London approach to capacity will ensure that we can continue to service London's businesses and communities and support the complex ecosystem that depends on industrial land, as highlighted in our report, *The Importance of Industrial and Logistical Land to London*. It is vital that pressure to increase housing delivery, over and above the current DNLP housing target, does not result in a dilution of industrial protection policy or a reduction in this industrial intensification target. It is also important that some well-connected industrial land is retained, particularly for new industrial occupiers. For example, innovation advanced manufacturing needs to be located close to science and innovation clusters.
157. The approach to industrial intensification is generally supported. Multi-level and co-location policies in the current Plan have not delivered as hoped, and therefore removing and reducing their prominence is appropriate. However, even though multi-level industrial facilities are not currently viable in London, the DNLP relies on dense industrial typologies in its assumptions. These would need to take the form of multi-level warehouses served by large ramps, which can only be delivered on large sites (5 acres and above). A degree of caution is needed in this approach if such facilities are to form part of the future of urban warehousing. This is because of their scale of built form and intensity of activities, which demand space and distance from residential and other sensitive uses. Any reduction in the size of London's SILs/LSIS, including as a result of policy PV5, risks compromising their future feasibility and the ability to deliver industrial intensification.
158. We also have concerns regarding the proposed glossary definition of "industrial intensification", which defines it principally through an increase in industrial *floorspace* capacity. This risks creating an overly rigid test for sites where intensification may be constrained by operational requirements, yard space, access, servicing, building massing or other site-specific constraints. The definition should allow for intensification to be demonstrated through more efficient use of land and improved operational capacity where an increase in floorspace is not feasible or appropriate.
159. In the development management section at **GLE2 F**, we propose that the list of uses to be supported in SIL and LSIS locations should include a **new point (5)**:

sui generis uses for creative production, rehearsal, studio and related activities, where they are compatible with the SIL and LSIS designation, and are listed with suitable uses in a relevant BFOA strategic growth vision

160. In **Table 4.1**, “Storage and distribution demand benchmarks by PMA”, the Property Market Area approach, as opposed to a borough-by-borough breakdown, is sensible and supported. However, this will require active engagement from the GLA in local plan preparation to ensure the benchmarks are reflected locally. There should also be a clear monitoring framework, with defined actions where delivery falls behind the benchmarks.
161. There are concerns about whether the evidence behind this table in Arup and Nexus Planning, *Economic Uses Supply and Demand Study* (2026), is realistic and whether the proposed industrial land benchmarks are sufficiently ambitious in scale. The 520-hectare requirement to 2050 relies in part on significant efficiency savings and industrial intensification, but there is limited evidence from operational multi-level industrial schemes to demonstrate that these efficiencies can be achieved at the scale assumed. Automation may also be constrained by the cost of investment and limited power capacity across London. The GLA should therefore provide greater clarity on the assumptions underpinning the benchmarks, including whether the demand modelling takes account of Heathrow expansion.

GLE3: Data centres

162. The introduction of a dedicated data centre policy is welcome, recognising their role in delivering and facilitating London’s growth, supporting the digital economy and ensuring London remains internationally competitive. The policy provides an important opportunity to take a positive and strategic approach to meeting London’s future data centre requirements.
163. The policy should reflect the important relationship between data centres and industrial land. Data centres have historically been located on industrial land because of its availability and proximity to power and digital infrastructure. Established locations can also support clustering, network resilience and efficient use of existing infrastructure. The policy should support proposals for data centres on industrial land where this can be done without reducing its net industrial capacity. We propose that **GLE3 A(4)** should be strengthened with the following additional wording:
- “Availability of land without compromising the need to maintain industrial capacity and the supply to meet local housing needs as well as employment and infrastructure needs that depend on freight transport infrastructure, including opportunities to intensify or make more efficient use of existing industrial land and”*
164. The spatial strategy should provide greater clarity on how London’s future data centre requirements will be met. While the Plan forecasts future demand and considers clustering, it provides limited guidance on where sufficient suitable land exists to accommodate this growth. The GLA should provide clearer strategic guidance on potential locations, taking account of land availability alongside electricity, water and digital infrastructure capacity and forecast demand. It should also explain how forecast demand translates into land requirements and establish an interim policy approach to support development on SIL and LSIS where appropriate, until boroughs have identified and

allocated suitable sites through their local plans, without undermining overall industrial capacity. Given the scale and strategic importance of data centres to the London and UK economy, this should be supported by a coordinated London-wide approach rather than relying solely on individual boroughs, which may not have access to the detailed information or expertise needed to identify suitable sites. We propose the following addition to **GLE3 B(1)**:

“first, collaborate with the GLA and neighbouring authorities within and outside London.”

165. GLE3 should also be more closely aligned with MBUL4. Data centre planning should not be separated from the availability and delivery of electricity, water and digital infrastructure. The Plan should establish a clearer vision for coordinating these requirements at a strategic level and ensure that infrastructure constraints do not prevent otherwise suitable locations from being identified.
166. The reference to existing electricity capacity should also be clarified. A current lack of available capacity should not automatically rule out a location where network reinforcement is planned or could reasonably be delivered. We propose the following addition to GLE3 E **as new GLE3 E(4)**, to distinguish between fundamental infrastructure constraints and those that can be addressed through planned investment:

consider where additional capacity can reasonably be provided through planned or deliverable network investment or reinforcement.

167. Overall, the policy should provide a positive and coordinated framework for identifying and enabling the data centre capacity London will require, giving boroughs sufficient clarity to identify sites and ensuring the spatial strategy is deliverable alongside the infrastructure needed to support it.

GLE5: Culture and creative industries

168. Support for the culture sector and creative industries in GLE5 is welcomed, in particular Part A in respect of plan-making for the protection of existing uses and managing new ones.
169. However, there is currently an inconsistency in approach across **GLE5 A and D**. At GLE5 A(2), plan-making authorities should *“consider requiring the replacement of a facility or use, where a development proposal leads to the unavoidable loss of a cultural space”*. Whereas at GLE5 D, there is an explicit requirement in development management decisions to re-provide: *“Where there are existing cultural facilities, development should provide/re-provide at least an equivalent amount of cultural space with similar affordability for end users in line with GLE7 Affordable workspace.”*
170. We support the plan-led approach in Part A. Generally speaking, existing uses should be protected as a matter of principle; however, there may be instances where facilities choose to relocate, possibly where culture provision is selected to drive regeneration in a BLG (e.g. at Here East in Stratford), or there may be a strategic decision to consolidate facilities in a cluster to bring agglomeration benefits. In such scenarios, it may not be necessary, or desirable, to re-provide a use on the same site. These spatial considerations

should be addressed through the local plan process, supported by evidence of need and developed in collaboration with the relevant cultural and creative organisations. The wording of GLE5 D should therefore be amended.

171. GLE5 D should also be updated to remove the explicit reference to affordable workspace. The ambition to provide affordable workspace for cultural and creative organisations, where there is evidenced local need, will already be covered comprehensively by GLE7. It also needs to link back to the developer contribution prioritisation set out at MBUL1 A(4) and our proposed planning balance policy prioritisation for affordable housing and economic growth under MBUL1.

172. We propose the replacement of current draft **GLE5 D** with the following:

Where there are existing cultural uses, development should re-provide at least an equivalent amount of cultural space, subject to evidenced local plan policies, development viability and MBUL1.

173. The policy support at **GLE5 E** for the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities is welcomed. Such uses can bring enormous community and social benefit while longer-term plans for a building or site are realised. However, it is imperative for the landowner's long-term refurbishment, redevelopment or regeneration plans that such uses are temporary. While a permanent arrangement may ultimately be agreed between a landlord and tenant, the policy should not create an expectation among occupiers or the local community that temporary uses will become permanent.

174. To address this concern, GLE5 E should be updated with the insertion in red:

"The temporary use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time should be supported. This may also be appropriate in industrial areas, where the safety of visitors is addressed and if it can be ensured that industrial activities including any 24-hour operations are not compromised."

175. Finally, in the explanatory text for GLE5 at paragraph 4.51, boroughs are encouraged to make use of the Mayor's Cultural Infrastructure Map. It is noted that this is a static source of data that represents a snapshot in time. If boroughs are encouraged to rely on this for plan-making and decision-making, this must be regularly updated.

GLE7: Affordable workspace

176. The policy requirement for commercial developments to deliver affordable workspace as planning gain was an area of concern during the last London Plan review, and its implementation has since proven to be problematic, as demonstrated in our report with DS2 and DP9, Delivering Affordable Workspace in London.

177. DNLN policy GLE7 goes further than current London Plan policy E3, which recommended area-focused policies linked to evidence-based need. Instead, **GLE7 A** opens by stating, "Plan-making authorities should include policies to support the delivery of affordable

workspace...” There is no justification for every LPA in London bringing forward an affordable workspace policy, and it is not appropriate.

178. Firstly, GLE7 is being brought forward in very different circumstances to when E3 was conceived in 2017. Since then, there have been structural changes in the commercial property market arising from the pandemic, and there is predicted to be an increase in vacant commercial space in secondary locations. CBRE estimated that by 2027, 15.9 million sq ft of commercial space in Central London will return to the market due to large leases expiring; however, only 9% of this space meets required energy performance standards. CBRE further estimated that upgrading the 11.9 million sq ft of inefficient office space to EPC A or B would cost approximately £370 million, equating to roughly £31 per sq ft.
179. Yet GLE7 A is setting out a clear instruction to all plan-making authorities in London (you “should”) to bring forward an affordable workspace policy regardless of local need, the availability of low-cost secondary space, and other planning priorities in that area. The starting point should be for authorities to gather evidence to ascertain if start-ups and SMEs are being better served by the market than was previously the case and whether they have a demonstrable need for an affordable workspace policy.
180. Secondly, GLE7 seems to have been drafted in isolation without due regard to other policy priorities in the DNLP, most notably MBUL1 A(4), which rightly prioritises affordable housing provision and public transport improvements for developer contributions. The affordable housing priority will be relevant in any mixed-use schemes bringing forward both residential and commercial uses, while public transport improvements should be prioritised in all instances given the pivotal role they must play in the medium- and long-term delivery of the new Plan and its optimisation targets, and in the absence of capital investment from central government for such projects.
181. There are numerous other examples where GLE7 does not relate to the spatial priorities identified elsewhere in the DNLP. Currently, GLE1 specifically links affordable workspace re-provision to the displacement of existing business uses, GLE5 links it to Creative Enterprise Zones and displaced cultural facilities, PV2 refers to it in the context of sustaining the CAZ's economic ecosystem, and PV3 mentions it in respect of meanwhile uses and markets in town centres. GLE7 does not cross-reference any of these other policies or spatial priorities. Reframing GLE7 in this way would make it more effective and give it a greater sense of purpose in meeting specific, identified needs.
182. Thirdly, in response to current policy E3, many boroughs have adopted borough-wide affordable workspace policies that don't adequately reflect local circumstances and genuine need. Our report demonstrated a growing trend for local policies to set objectives, and the space that is often delivered is on-site, high-quality, Grade A office space in prime employment hubs. This space is often not suited to the demands of affordable workspace providers or the tenants in need of space in local communities. Furthermore, some of the affordable workspace tenants seeking a long-term lease at discounted rents in the new Grade A space are not necessarily the end users who were intended to benefit from the policy.
183. Finally, we do not support the inclusion of B8 storage and distribution uses being listed in the commercial proposals, which should trigger affordable workspace provision. Experience has demonstrated that delivering affordable workspace in this sector is more challenging for practical, management and viability reasons. Furthermore, analysis undertaken by Quod, and submitted as part of SEGRO's DNLP consultation response, highlights issues with the DNLP evidence base and the assumptions that underpin GLE7.

Robust scrutiny of the secondary industrial market shows that a significant proportion of existing industrial floorspace already trades well below prime rents, meaning the normal operation of the market already delivers an affordable option without policy intervention.

184. To address these four concerns, and ensure **GLE7 A** is positive, appropriate and effective, it should be amended as follows:

“Plan-making authorities should consider whether market evidence demonstrates a need for policies to support the delivery of affordable workspace, triggered by applications for new office, research and development or light industrial uses (Class E(g)), and/or data centres ~~and/or B8 storage or distribution uses~~ where justified by strategic and local evidence of need and an assessment of viability having regard to MBUL1 (A)(4) and where this is not being adequately provided for by existing, low-cost, secondary stock. Policies should focus on specific locations, economic sub-markets and/or specific sectors. Borough-wide policies should only be brought forward where there is strong justification to do so.”

185. In **GLE7 B**, the proposed range of end users is generally supported. The inclusion of hospitality, independent food and beverage uses is supported, provided the specific reference to the CAZ and town centres is retained in the final version.
186. **GLE7 C** lists seven criteria that “*Local Plans should set out*”. While presumably intended to provide helpful guidance for LPAs, we are concerned that they will treat this as a checklist that must be incorporated into local policies in its entirety.
187. When LPAs are drafting policies and viability testing them, they must use robust market evidence to interrogate the interrelationship between the depth of discount required to reach target rental levels, the timeframe of any planning obligation, the cost of provision and the impact of any on-site provision on the value and yield of the remaining commercial space. Striking the right balance between the criteria at **GLE7 C(4)–(7)** is complex. Given this complexity, local policies should be encouraged to allow for a degree of flexibility to respond to site-specific circumstances, changes in the market and the balance of competing developer contributions pursuant to MBUL1 A(4).
188. For these same reasons, the option for off-site provision or payments in lieu in **GLE7 C(7)** and **GLE7 D** is fully supported. This should help avoid the unintended consequences arising from poorly conceived local plan policies identified in our report. A planning policy requirement for affordable workspace provision through Section 106 planning gain is still a relatively new concept that is being tested in the market. There are recurring issues with long-term vacant space, particularly where Grade A office space has been delivered in prime office locations or where there has been an over-provision of affordable workspace (e.g. northern parts of Southwark). As a result, there is evidence of implemented planning permissions now being revised to remove it. All of this reinforces the need for a flexible approach, particularly at a strategic level.
189. Off-site delivery often provides the optimum outcome for all stakeholders. Opportunities to create agglomeration benefits and collaboration within buildings and hubs are enhanced. It can work particularly well where a developer has multiple holdings across a portfolio. Alternatively, payments in lieu can be pooled from several developments for local authority-led affordable workspace hubs, to subsidise market rents rather than provide physical space, or to provide financial support for existing affordable workspace facilities that are vulnerable or at risk because of other market forces.

190. Specifically in relation to **GLE7 C(6)** and “the length of time for the affordable workspace provision”, **paragraph 4.66** requires affordable workspace to be secured in perpetuity or, where this is not feasible or viable, for a period of at least 15 years. When affordable workspace is the form of on-site provision, this is challenging to deliver and significantly impacts the viability of the primary commercial development for reasons of ownership structures, refinancing requirements and redevelopment cycles. Open-ended or very long-term S106 restrictions can discourage the comprehensive refurbishment or redevelopment of existing stock, which the DNLP otherwise seeks to encourage. We request that paragraph 4.66 instead refer to the need for local plans to define a viability-tested period.

GLE8: Access to employment and skills

191. The ambition to maximise employment, apprenticeship and skills opportunities arising from major development is supported. However, to ensure the policy is justified and effective, requirements should be proportionate to the scale and nature of development and focused on opportunities that can realistically be created through a particular scheme. Any enforceable, fixed targets with consequences for non-compliance should be focused on the construction phase of a project because developers do not have control over the employment practices of end users.
192. The policy should therefore provide flexibility rather than introduce prescriptive requirements that may not be appropriate or deliverable in all cases. To address this concern, we propose that a new, fourth criterion is added to **GLE8 B**:

ensure opportunities are proportionate to the scale of the development and realistically deliverable.

193. There should also be greater alignment between the implementation of GLE8 and employer-led evidence of skills needs. In this regard, the London Local Skills Improvement Plan (LSIP) should be specifically referenced as a source of evidence on priority skills needs, with local labour and training initiatives secured through planning obligations aligned to these priorities where possible.
194. We propose the following amendment to the implementation text for GLE8 at paragraph 4.73:

“Employment and training targets included in planning obligations should be based on the number of new employment opportunities (measured on a full-time equivalent basis, in the construction ~~and completed-use~~ phases of development) and apprenticeship and training starts and completions. Take-up of employment and training by London’s out of work, under-employed and under-represented communities in the workforce in relevant sectors appropriate to the development should also be reflected in targets and monitoring. Evidence related to under-represented groups in the labour market can be sourced from the Inclusive Talent Strategy (ITS) and Get London Working Plan evidence base. The London Local Skills Improvement Plan (LSIP), alongside the Industrial Strategy and other relevant employer-led evidence, should also be used to inform priority skills needs and targets.”

195. The policy should also support a more coordinated approach to Section 106 local labour agreements across borough boundaries. London operates as a single labour market, and developers should be able to draw from a wider pool of London residents, rather than requirements creating 33 separate local labour markets. While the implementation text at paragraph 4.74 encourages *“reciprocal arrangements between local authorities... to open up opportunities...to residents from adjacent boroughs”*, this aspect could be strengthened, and it should encourage collaboration with training and skills providers, including further education and higher education institutions. This would support a more effective and deliverable approach to meeting London’s skills needs.

GLE9: Aviation

196. We strongly support the recognition in paragraph 4.82 of aviation’s role *“in supporting London as a global city and engine for economic growth”*, alongside the prioritisation of surface access and transport infrastructure enhancement.

197. The Government’s draft Heathrow Expansion National Policy Statement (HENPS), published in June 2026, reaffirmed the Government’s support for Heathrow expansion and the Heathrow Northwest Runway scheme. Policy GLE9 C should therefore specifically recognise the unique role of Heathrow as the UK’s only international hub airport, and support the provision of additional capacity, given the draft HENPS represents an important material consideration and indication of the Government’s current policy direction.

198. The requirements and conditions set out in GLE9 B in relation to proposals for expansion at Heathrow and other airports are set at such a high bar that it is questionable whether they could ever realistically be met. The policy should provide greater support for Heathrow expansion to proceed, given the strategic benefits for London and the economic benefits it would deliver across the UK’s nations and regions, while recognising the scale and complexity of the investment involved and allowing reasonable environmental, transport, and congestion mitigation measures to be negotiated through the appropriate consenting process.

GLE10: Safeguarded wharves

199. The overall approach to protecting safeguarded wharves and supporting 24/7 freight operations is welcomed. Wharves and river freight play an important role in supporting London’s development and wider economy, providing an efficient means of moving construction materials and other goods while reducing the volume of freight moved by road and pressure on the road network, in line with the Mayor’s wider objectives for freight.

GLE11: Circular economy

200. The overall ambition of GLE11 to promote more efficient use of resources and reduce construction waste is welcomed. We have consistently supported the principle of a more circular economy, provided policy requirements are supported by robust evidence and are achievable in practice.

201. GLE11 should allow for flexibility to reflect the particular circumstances of individual schemes. Opportunities for reuse, adaptation and material recovery vary significantly between sites and development types, and retaining or adapting an existing building will not always be feasible or the most sustainable outcome overall.
202. **Paragraph 4.95** should be amended to make clear that consideration of retention, reuse and adaptation should have regard to the viability of these options, taking into account the characteristics of the site and proposed development. Where retention, reuse or adaptation is not feasible or appropriate, opportunities for material recovery and reuse should be considered.
- “Development proposals should seek to manage as much waste on site as possible, and strategies which prioritise retention of existing structures should be robustly considered, having regard to viability, the type of development and site circumstances. Further guidance can be found on the GLA website,⁷⁰ which will be updated as appropriate to account for best practice.”*
203. This amendment would help prevent GLE11 from being applied in an overly prescriptive way that adds unnecessary cost or complexity to a project and instead allows applicants to demonstrate the most appropriate approach for their scheme. This will help ensure the policy remains proportionate, effective and deliverable.

GLE12: Waste

204. Fundamentally, GLE12 has been brought forward without any associated evidence to justify the increased waste-arising forecasts in accompanying Tables 4.3 and 4.4. The forecasted increases over the period 2024 to 2050 have direct implications for the amount of land and infrastructure needed to manage London’s waste and meet its net self-sufficiency target. The GLA should therefore publish the supporting evidence so that it can be scrutinised ahead of and during the Plan’s examination.
205. Understanding London’s objectively assessed needs in this regard is important because, as London continues to grow and the number of waste sites reduces, pressure will increase on the remaining sites to accommodate a wider range of waste management, resource recovery and circular economy activities. With this in mind, GLE12 should therefore provide a positive and flexible framework that enables existing sites to expand, intensify and incorporate complementary uses where appropriate.
206. To address this concern, we propose the following addition to **GLE12 C(1)**:
- “existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their (environmentally appropriate) capacity including through opportunities to intensify existing sites and accommodate complementary activities”*
207. We support the ambition to move beyond residual waste management towards greater resource recovery and secondary material production. However, the policy should provide greater clarity on the planning flexibility, land requirements and supporting infrastructure needed to deliver this transition. Greater certainty is also needed on how boroughs should

assess proposals for additional processing activity, new facilities and complementary uses at existing waste sites.

208. This will help ensure the policy is effective in meeting London's future waste and circular economy needs, while providing sufficient certainty for operators to invest in existing sites as the number of sites reduces.

General comments on Chapter 4

209. In relation to our specific comments on Chapter 4, it is important to link back to our comments in respect of MBUL1 A and our request for it to be strengthened to support the Good Growth objective "Growing London's economy in a way that benefits all" and explicitly require the prioritisation of economic growth and housing delivery in the planning balance in instances where there are competing detailed policy requirements elsewhere in the Plan.
210. We support the DNLP stance on the protection of industrial land and growth in industrial capacity driven by industrial intensification. It is vital that pressure to increase housing delivery, over and above the current DNLP housing target, does not result in a dilution of industrial protection policy or a reduction in this industrial intensification target.
211. The introduction of a dedicated data centre policy for the first time is welcome, recognising the important role they play in supporting London's growth, digital economy and international competitiveness. Across this chapter, we have considered the interrelationship between data centres, industrial land, land swaps and the electricity, water and digital infrastructure needed to support this growth.
212. Collectively, the policies on waste, the circular economy, and access to employment and skills must remain proportionate and focused on what development can realistically deliver given the challenging economic backdrop. Requirements should be supported by clear evidence, reflect the scale and nature of individual developments and allow sufficient flexibility to respond to site and scheme-specific circumstances.

CHAPTER 5: CREATING A GREENER, RESILIENT AND HEALTHY CITY

GHR1: Energy-efficiency

213. GHR1 A makes it clear that "*plan-making authorities should not set their own energy-efficiency or emissions reduction standards in local plans*". We support a consistent approach across London, which would be preferable to the different approaches currently taken by individual LPAs and would provide greater clarity and consistency for developers operating across the capital.
214. The introduction of minimum energy use intensity (EUI) and space heating demand (SHD) standards also provides a clearer and more consistent basis for assessing energy performance.

215. The Plan should also recognise the potential for smart energy management systems and other emerging technologies to improve building energy performance, reduce operating costs and manage demand on energy networks. Policy should allow for innovation in how buildings achieve these outcomes, while ensuring that energy efficiency requirements remain proportionate and deliverable.
216. The proposed standards go beyond national Building Regulations and therefore need to be supported by robust evidence that they are viable and deliverable. This is particularly important given the NPPF requirement at policy PM13 (1)(b)(iii) that any local energy efficiency standards “that go beyond the current or proposed Building Regulations should have a clear and robustly costed rationale which shows that there will not be an adverse impact on the viability and deliverability of development”.
217. The GLA’s *London Plan Viability Study Phase 1 Report (July 2026)* (the Viability Study Phase 1) does not yet fully test the additional costs associated with the proposed GHR1 standards against the Building Regulations baseline, with further assessment proposed in a Phase 2 Viability Study. This will need to be carefully interrogated during the DNLP EiP to ensure the final version of GHR1 is appropriate and consistent with national policy.
218. We are particularly concerned about the proposed residential development EUI target of 40 kWh/m²/year. This appears challenging to achieve in practice and must be carefully examined in relation to the NPPF tests of soundness. While developers can control the design and construction of a building, they have limited control over how homes are occupied and operated. At the very least, the residential target should be reviewed to ensure it is evidence-based, achievable and proportionate to what developers can reasonably control. However, we fundamentally question whether this meets the tests of soundness as a spatial development strategy policy.
219. Specifically in relation to **GHR1 D**, the requirement for monitoring for five years should be removed. There are practical challenges with doing this, particularly for residential uses where access to homes can be challenging. If this is required to obtain a better understanding of modern construction and energy efficiency to inform better practice, then this should be done through some case studies rather than a blanket requirement on all new development.
220. In conclusion, the GLA should ensure that the final GHR1 standards are supported by a robust assessment of their incremental costs, and their impact on viability and housing delivery, while retaining the overall ambition to improve energy efficiency.

GHR2: Low-cost low-carbon heat

221. We welcome the more technology-neutral approach proposed in GHR2 compared with the current London Plan. This is more appropriate for a spatial development strategy, allowing the most suitable technology to be determined according to the characteristics of individual sites and developments rather than prescribing a particular solution that may become dated or superseded over the life of the Plan. We recommend adding a provision to GHR2, similar to GHR1 A, making clear that plan-making authorities should not express preferences for particular technologies, ensuring a consistent approach across London.

222. The previous approach of prioritising district heat networks has resulted in developments being required to future-proof their designs for connections to networks that do not currently exist and, in some cases, are unlikely to come forward. This can impose substantial additional costs on development without a clear prospect of the infrastructure being delivered or providing a corresponding carbon benefit.
223. GHR2 provides greater flexibility for applicants, plan-makers and decision-makers to consider the most appropriate solution for each scheme. This should support more cost-effective and deliverable development while still enabling low-carbon heat solutions to be pursued where they are appropriate and viable.
224. The approach is therefore more likely to be effective and deliverable, as it avoids locking developments into a particular technology where this may not be suitable or available. It also provides greater flexibility to respond to changes in technology and market conditions over the Plan period, supporting a more resilient approach to meeting London's heat decarbonisation objectives.

GHR3: Whole life-cycle carbon

225. We support whole life-cycle carbon being addressed through a London-wide strategic policy in the new London Plan. A consistent approach is preferable to many different versions of the same policy across London, particularly for a policy involving technical and specialist requirements. Setting this at a strategic level provides greater clarity and consistency for developers and avoids unnecessary variation between LPAs.
226. We recognise the importance of reducing whole life-cycle carbon but consider that the proposed approach in GHR3 could present particular challenges for high-density development. The form, scale and structural requirements of high-density schemes can result in higher embodied carbon, and these factors are not always within the developer's control. Recent research by the London Property Alliance and Arup, based on 76 office-led developments in Central London, identified a clear relationship between building height and upfront embodied carbon, with each additional storey associated with an average increase of around 5 kgCO₂e/m² for new-build office projects. This highlights the significant variation in embodied carbon that can arise from different forms and scales of development and the need for targets to be evidence-based, achievable and proportionate.
227. Amendments are needed to **GHR3 C(1)**. Firstly, a single baseline and aspirational target for all Class E development risks being overly prescriptive. Class E covers a wide range of uses and building types with different construction, servicing and operational requirements, and therefore different embodied carbon profiles. The policy should allow sufficient flexibility to reflect the circumstances of individual schemes.
228. Secondly, the policy should allow for scheme-specific circumstances where meeting a fixed target would be disproportionate or undermine development viability. To address these two issues, GHR3 C(1) should be amended as follows:

~~"As a minimum, p-Proposals~~ should meet the relevant baseline targets and aim

to meet the aspirational targets having regard to development viability, MBUL A(4) and scheme-specific circumstances:”

229. Given the wider development viability challenges that currently affect all sectors, alongside the current flaws in the Phase 2 Viability Study, the GLA must ensure that the cumulative viability impact of the proposed whole life-cycle carbon requirements is comprehensively assessed and that the targets in the final version of GHR3 C(1) are achievable across different development typologies and uses. This is necessary to ensure the policy is effective, deliverable and does not unnecessarily constrain development.

GHR4: Heat risk

230. The overall ambition of GHR4 to reduce overheating and improve resilience to future heat risk is welcomed. However, the policy introduces requirements that can have implications for building design, development capacity and cost. The GLA’s own *Towards a New London Plan* consultation recognised that overheating requirements, such as dual aspect units in flatted development, can result in less efficient layouts, reduced floorspace and, in some cases, fewer homes being delivered, as well as increasing build costs and thus reducing a scheme’s ability to deliver prioritised planning gain. The concern is that these increased costs and development implications have not been adequately reflected in the DNL’s viability evidence (the Phase 2 Viability Study). The evidence base should therefore be updated to properly assess the cost and development viability impacts of GHR4 across different development types and densities, including its cumulative impact alongside other requirements in the Plan, so that the policy can be applied in a way that is both effective and deliverable.
231. Furthermore, **GHR4 B** should provide sufficient flexibility to respond to site- and scheme-specific circumstances. Measures such as orientation, glazing, shading and ventilation will not be equally suitable or achievable on every site, particularly for high-density or physically constrained development. It should therefore avoid becoming a rigid checklist and allow applicants to demonstrate the most appropriate combination of measures for their scheme. To address these issues, GHR4 B should include the following addition:

“In planning for heat-resilient buildings, the risk of future warmer-climate scenarios should be considered and mitigated as part of a passive design approach to development, to account for London’s particular overheating risks. In addressing and mitigating heat risk, applicants for major development should justify, in the planning application, how the design of the development maximises passive design measures, and minimises the energy use associated with any cooling, by using the following measures having regard to development viability, MBUL (A)(4) and scheme-specific circumstances:...”

232. This update would help ensure the final version of GHR4 is proportionate, effective and deliverable, particularly given the current viability challenges facing development in London.

GHR5: Flood risk and drainage

233. The overall ambition of GHR5 to manage flood risk and improve the resilience of new development is welcomed. However, the policy would benefit from greater clarity to ensure it can be implemented effectively and does not create unnecessary uncertainty for applicants and decision-makers. We support the Plan's emphasis on sustainable drainage and would encourage the policy to remain proportionate and focused on measures that are appropriate to the scale and nature of the development.
234. The relationship between GHR5 and GHR9 should also be clarified, particularly where their flood risk requirements overlap. The Plan should clearly distinguish between surface water drainage under GHR5 and riverside and river flood risk requirements under GHR9. This would avoid duplication and provide greater certainty about what is expected from development proposals.

GHR7: Green infrastructure and Urban Greening Factor

235. It is our view that GHR7 is not compliant with NPPF Policy PM13 ("Setting Standards") and therefore should be removed from the Plan.
236. If it is retained, carrying forward the Urban Greening Factor (UGF) targets from the 2021 London Plan would provide continuity for applicants and boroughs. However, as we set out during the preparation of the current London Plan, the targets should not be applied rigidly without regard to site circumstances. Instead, the UGF should take account of the size and context of a site and the nature and benefits of the proposal. This remains relevant, particularly for high-density and constrained sites where meeting a fixed target can have implications for building design, roof space, plant and development costs.
237. The policy should therefore retain the targets as a clear starting point, while allowing sufficient flexibility where site-specific circumstances make them challenging or impossible to meet alongside other design requirements. We propose the following amended wording to **GHR7 C**:

"Major development proposals should use the UGF to demonstrate how appropriate amounts and types of greening have been incorporated by ~~meeting~~ targeting the following ~~target~~ scores ~~as~~ set out in Table 5.1, having regard to site-specific circumstances."

238. This is particularly important given the current viability challenges facing development in London and the cumulative cost of planning and regulatory requirements. GHR7 should avoid placing additional onerous requirements on development where they cannot be justified by the benefits delivered, ensuring the policy remains effective, proportionate and deliverable.

GHR9: Clean and Healthy Waterways

239. As outlined in our response to GHR5, the relationship between the two policies should be clear and avoid unnecessary duplication. The Plan should clearly distinguish between the requirements for surface water drainage under GHR5 and those relating to riverside and river flood risk under GHR9, so that applicants and decision-makers have clarity on what is expected.
240. Policy GHR9 should also recognise the need to balance environmental improvements with the continued operation of river-related infrastructure and economic activities, taking account of the different constraints along the river. This would help ensure that improvements to water quality, biodiversity and the riverside environment can be delivered without unnecessarily restricting existing and future economic activity.

GHR11: Cycle and car parking

241. We are pleased to see reduced cycle parking standards in GHR11. The approach set out in March in the *Support for Housebuilding LPG* has been further developed with the addition of a fourth locational band. However, we do not believe the changes go far enough; the newly proposed Band 4 standards should apply across the whole of London for all forms of residential development. Our research found that average utilisation across the 29,164 residential spaces tested was 24%, while utilisation across the 5,985 PBSA spaces was just 4.6%. The schemes tested covered the breadth of London, suggesting that low utilisation is not limited to particular locations. This is also against a backdrop of rapidly changing travel patterns and a significant increase in dockless e-bike use, with Lime Micromobility recording an 85% increase in total journeys between 2024 and 2025. Taken together, this suggests there is further scope to reduce minimum cycle parking requirements while continuing to meet current and future demand. Band 4 should therefore be applied across London.
242. In GHR11 Table 5.7 (*“Number of short-stay cycle parking spaces to be provided for customers and visitors of non-residential development, by band”*), the move to base commercial cycle parking requirements on Net Internal Area (NIA) rather than Gross External Area (GEA) is welcome. NIA provides a more accurate measure of occupiable workspace and likely cycling demand. This change should help ease viability pressures on office development by ensuring cycle parking requirements are more closely aligned with the space that is actually occupied. This is particularly important at a time when maintaining the supply of high-quality, prime office space is critical to London's economy and the viability of office development is challenging.
243. We are also concerned that the proposed reduction in car parking standards does not adequately reflect the needs of industrial and logistics development, which is often located in less accessible areas near the strategic road network and often operates outside public transport hours. The methodology used to calculate the standards does not fully account for these requirements. GHR11 should therefore introduce specific standards or greater flexibility for industrial uses. The policy should also allow parking to be re-provided above the proposed maximum levels where necessary to support the intensification of existing industrial sites and avoid disadvantaging modern industrial units compared with older stock that offers more parking.

General comments on Chapter 5

244. There have been some welcome improvements to the policy approach to creating a greener, resilient and healthy city compared with the current London Plan; however, the key issue with Chapter 5 is to understand the net impact of the chapter as a whole in balancing sustainability objectives against development deliverability.
245. The move to a more technology-agnostic approach to low-cost and low-carbon heat is welcome. Efforts to reduce the cost burden placed on development are also welcome, most notably the deletion of the requirement for carbon offsetting contributions. However, new cost burdens have been introduced through policy requirements that go further than Building Regulations, such as the energy-efficiency standards in GHR1.
246. There is concern in the industry that the costs associated with several of the policies in this chapter have not been adequately reflected in the DNLP's viability assessment (the Viability Study Phase 1). This is particularly important where the Plan goes beyond national policy and Building Regulations, including through its requirements for energy efficiency, overheating and whole life-cycle carbon.
247. The cumulative impact of these policy changes needs to be properly understood in relation to the net impact on build costs and deliverability. While individual policies may be achievable in isolation, their combined effect can have a prohibitive impact on development costs, design efficiency and ultimately the value available for affordable housing and public transport improvements (as per MBUL1 A(4)) as well as other planning obligations. The final Plan must therefore ensure that its environmental ambitions are supported by policies that are both effective and deliverable, with the additional costs of going beyond national requirements properly evidenced and reflected in the viability assessment.

CHAPTER 6: PLACE VISIONS AND PLACE-BASED APPROACHES

PV1: Brownfield First Opportunity Areas (BFOAs)

248. As set out in a series of recommendations in our report with Quod, we have called for a refresh of Opportunity Areas, and we are pleased to see these reduced in number from 48 to 30, with a re-focus on brownfield regeneration and less overlap with other designations, such as town centres, which already benefit from access to key infrastructure and already have high policy expectations for homes and jobs growth.
249. PV1 has elements of a development management policy, which is not consistent with PM1 of the NPPF. The language throughout, in respect of both plan-making and development management, could use more positive language to indicate the extent of the Mayor's ambition for BFOAs given their pivotal role in the spatial strategy and the Plan's deliverability.
250. The seven criteria listed at PV1 B largely repeat policies in other parts of the DNLP. For example, the provision of meanwhile uses at PV1 B(7) is already covered in GLE5 E and PV3 A(5), and we question whether it is necessary to repeat the point in PV1.

251. Consideration should be given to the relationship between MBUL1 A(4), regarding the prioritisation of affordable housing provision and public transport improvements for developer contributions, and MBUL1 (A)(5), which affords some flexibility on this for strategic sites. This is one area where further text and clarification in PV1 would be helpful. In the case of all BFOAs, it is our view that infrastructure provision more broadly should be prioritised, not just public transport improvements.
252. Finally, linked to PV1, in Annex E (“Brownfield First Opportunity Areas strategic growth visions”) it is important to highlight that some of the pink boxes setting out the headlines for each BFOA do not include the relevant transport investment required for that area. For example, the expansion of Stratford International Station should be included in the pink box for the Olympic Legacy BFOA. These should be reviewed and corrected.

PV2: Central Activities Zone (CAZ)

253. We welcome that the name “Central Activities Zone” (CAZ), recognised internationally by investors, has been retained and that the boundary, including the Northern Isle of Dogs, also remains unchanged.
254. The proposed CAZ strategic functions referenced at PV2 A(1) and listed in the accompanying Box PV2 are comprehensive and supported.
255. At **PV2 A(2)**, the reference to “*provision of net additional prime office*” is welcomed. The specific use of “prime” is an important distinction and should be carried forward into the final version of the Plan. However, it is noted that there is no definition of “prime office” in the Glossary, nor of “prime location” (referred to in paragraph 4.65). Consideration should be given to providing Glossary definitions for both to avoid any ambiguity in policy priorities – and especially given that “prime locations” are encouraged “*to be determined locally*” at 4.65. This would make PV2 more effective.
256. At **PV2 A(4)**, we support the fact that the existing **West End International Centre (WEIC)** designation has been repositioned from having a solely retail focus to being “*a vibrant international centre for commerce, culture and experience*”, which far better reflects the important role it plays in London’s economy and in attracting domestic and international visitors.
257. In the Strategic CAZ diagram in **Figure 6.2**, the West End and Knightsbridge International Centres have been given specifically defined boundaries for the first time. In theory, this brings improved clarity and spatial precision to these strategically important locations, but it raises questions about where the boundaries have been drawn and why. We consider that the WEIC boundary has been too tightly defined, especially to the north and to the east. For example, it currently excludes Harley Street, which is an internationally important healthcare destination, and it should also extend further into the London Borough of Camden so that the WEIC designation can be used effectively to address cross-boundary issues across the West End.
258. At **PV2 A(6)**, we support the designation of five national rail termini and their immediate environs as **CAZ Transformational Gateways** where growth potential for CAZ strategic functions should be realised. This new category within the Broad Locations for Growth recognises the potential for regeneration associated with major station redevelopment,

which links well with the new NPPF and the national planning policy focus on maximising the potential for growth at stations. However, the ambition for the CAZ Transformational Gateways can only be fully realised with capital investment in the redevelopment and modernisation of the stations themselves. This should be recognised in PV2 A(6) as follows:

“Realise the growth potential of the CAZ transformational gateways associated with capital investment at the national rail termini (including at Euston, Liverpool Street, Paddington, Victoria and Waterloo), for development that supports CAZ strategic functions.”

259. Also in respect of the CAZ Transformational Gateways, in the implementation text they are only mentioned briefly at paragraph 6.12. Given they are hugely significant locations within London, with national connectivity and huge potential for growth in CAZ strategic functions, we believe that the DNLP should set out a clearer purpose and vision for these areas to ensure their potential is fully realised. The DNLP should also include a brief explanation as to the collaboration needed between the GLA, relevant boroughs, and transport stakeholders in ensuring the CAZ Transformational Gateways are optimised and delivered successfully.

260. In **PV2 A(9) and (10)**, we support the two-tier approach to “Core CAZ” and “Mixed CAZ”. However, when PV2 is read in its entirety, there appears to be some tension between PV2 A(10) and PV2 C, with the former PV2 A(10) more positively worded to encourage new residential development in Mixed CAZ areas and PV2 C stronger on the protection of CAZ strategic function uses in Mixed CAZ, unless a site has been allocated for housing or housing-led mixed-use development. We submit that PV2 should provide for a more flexible approach to realising the potential for new housing in Mixed CAZ areas without the need for a local plan allocation.

261. To address this, **PV2 C** should be amended to include a **new part (4)** to deal with non-allocated sites as follows:

meets local criteria-based policies for housing set out in the relevant local plan

PV3: Town centres and high streets

262. A single, consolidated policy on town centres and high streets brings clarity. Furthermore, we welcome increased flexibility and policy support for redevelopment and change of use of surplus commercial space to other uses, including housing, in line with our report with CBRE, *From Vacancy to Vitality*.

263. Similarly to the point made under GLE5 above, the policy support for meanwhile use of vacant sites at **PV3 A(5)** is welcomed. Such uses can bring enormous community and social benefit while longer-term plans for a building or site are realised. However, it is imperative for the landowner’s long-term plans that the starting point for such uses is that they are temporary. Notwithstanding that a permanent arrangement may be willingly negotiated between landlord and tenant, the policy position should be that there is no expectation created for the tenant or the local community that such uses must become permanent.

264. To address this concern, and to improve the consistency of language with policy GLE5, PV3 A(5) should be updated with this text in red:

“Support ~~flexibility for ‘meanwhile’ use of vacant sites and premises~~ the temporary use of vacant properties for pop-ups or meanwhile uses including affordable workspace and cultural facilities.”

PV4: Strategic economic clusters and corridors

265. The new “strategic economic cluster” (SEC) designation is supported, and we welcome links to the London Growth Plan. However, given the important and cumulative role of the SECs in London’s economy, the rationale and ambition for SECs should be strengthened. Increased emphasis on economic growth will ensure that the Mayor can intervene in the event a borough is not adequately supporting economic growth in an SEC. We propose this insertion in red to **PV4 C(1)**:

“provide non-residential floorspace appropriate to the needs of businesses and institutions associated with the cluster, including specialist economic sectors where relevant, and seize opportunities to support business expansion and economic growth including in emerging sectors”

266. There is concern that the current wording at **PV4 C(4)** could undermine the economic performance of an SEC and therefore should be amended as follows:

“provide or support a mix of uses across the cluster, as appropriate, including housing where this would not compromise the commercial functions of the cluster.”

PV5: Industrial land supporting housing growth

267. We welcome the DNLP’s more coordinated approach to land use distribution and the proposed strategic land use swaps, including the release of protected industrial land in accessible locations that could support higher-density housing, and the use of some Green Belt sites for industrial and logistics uses that are not dependent upon access to public transport. This is something that we have been calling for since the last London Plan review, and it would be a substantial net gain for London as a whole.

268. However, PV5 must include appropriate safeguards to ensure there is no net loss of industrial capacity. This is especially important given there are concerns in the industry (see, for example, the DNLP consultation response submitted by SEGRO) that there has been a significant underestimation of the need for logistics and warehousing land combined with overly optimistic assumptions about the extent of industrial intensification that can be achieved through denser multi-level warehouses (see our comments under GLE2).

269. The benefits of the strategic land use swaps will depend on replacement industrial capacity being secured and delivered in advance, within the same area, so that the release of existing capacity does not run ahead of its replacement. We therefore support

the policy position in MBUL1 and PV5, subject to this being reflected in the Plan's approach to land swaps and planning decisions.

270. Specifically in relation to **PV5 A**, and the plan-making criteria for the release of industrial land for housing, we are concerned that SAM level 4 is too low a threshold. Consideration should be given to raising this to SAM level 5 to ensure that where land is released (having met the relevant exclusion criteria), its capacity for housing is maximised in the context of the Optimisation Framework in MBUL2. The scale of unmet need for industry and logistics, and the challenges of industrial intensification in the foreseeable future, demand that the benefits arising from any loss must be extensive, and it is questionable whether SAM 4 reaches a high enough bar.

PV6: Metropolitan Open Land

271. It is acknowledged that, while previous London Plans have afforded the same levels of protection for Green Belt and Metropolitan Open Land (MOL) in London, it is now necessary to have a MOL-specific policy that clearly deviates from Green Belt policy and its managed release. However, the PV6 wording on protection of MOL is highly restrictive and not consistent with national policy.
272. BusinessLDN members have quoted examples of MOL in London which are effectively “grey” MOL and/or not publicly accessible. They are therefore not true MOL deserving of strengthened protection. A comprehensive, qualitative review should be undertaken of London's MOL and amendments made to existing MOL boundaries where necessary.

PV7: Sustainable development and enhancement of the Green Belt

273. Policy PV7 is not consistent with national policy on several fronts, including the addition of a number of London-specific tests on top of the NPPF tests for Green Belt development. As per our comments on MBUL2, and to be consistent with the new NPPF, PV7 should also make a distinct reference to strategic sites.
274. **Table 6.3**, which sets out London's Green Belt-specific sustainable design criteria, quotes average density targets rather than minimum densities. This needs to be reviewed. We support the ambition to make the best use of any Green Belt land that is released for development. We also support the clear link between land use, residential density and access to rail and bus services. However, where land is released for housing, there may be clear tensions between policy aspirations and market-demand evidence.
275. The average densities in the table, ranging from 90 to 160 dwellings per hectare for different levels of accessibility, would largely translate into flatted forms of development. However, market demand in edge-of-London locations is predominantly for houses with gardens, alongside some smaller-scale demand for mid-rise flats. This is why we fully support the DNLP land swap strategy to release some well-connected industrial land for housing and re-provide industrial accommodation on Green Belt land. Where housing is to be delivered on Green Belt sites, minimum densities must be carefully considered in collaboration with market demand for housing typologies to ensure they remain ambitious yet deliverable.

276. Ultimately, development will only come forward if investors are confident that there is strong market demand for that product. Furthermore, on strategic sites, diversification of the range of dwelling sizes and building typologies generally supports overall delivery and build-out rate. Therefore, the minimum density figures quoted in the final version of Table 6.3 should not place an overreliance on flatted development.
277. In devising the minimum density figures for Green Belt locations, regard must also be had to development viability. This is especially significant given policy HN3 C sets an affordable housing target expectation of 50% for all schemes of 10 homes or more unless significant transport infrastructure delivery is proposed.
278. As highlighted above in the commentary for policy HN3, it is significant to note that the Viability Study Phase 1 evidence assumes a nil premium above Existing Use Value for any development on Green Belt land. This means the GLA's viability evidence is predicated on developers acquiring Green Belt land at its current value without the landowner seeking any additional premium for its development potential. This is an unrealistic assumption. Landowners must be incentivised to sell their land in the first instance, and they will expect to receive a premium for doing so. This should therefore be reflected in the GLA's viability appraisal.
279. If the GLA's Viability Study Phase 2, expected to be published prior to the EiP, is not updated to address this issue, the inevitable landowner's premium on a site will impact the ability of any development project to meet the policy requirements for Green Belt development elsewhere in the DNLP, especially the HN3 50% target for affordable housing. Cumulatively, proceeding with the DNLP on the assumption that no premium is payable to landowners, that there is a 50% target for affordable housing, and that development must be largely of a flatted typology, will call into question whether any Green Belt sites will actually come forward for development. Given that the spatial strategy is predicated on 10% of all new development being delivered on Green Belt land, including 56,100 new homes, this is a serious issue for the soundness of the Plan.

PV8: Strategic and local views

280. As per our TANLP response, we support the review of London's strategic and local views to ensure a proportionate approach is carried forward into the new Plan. Advances in digital technology provide an opportunity for a more sophisticated approach to improve consistency in decision-making and strike the right balance between heritage protection and optimising development potential to support growth.
281. We look forward to engaging in more detail through the parallel consultation on the London View Management Framework (LVMF) to ensure it provides proportionate protection of London's heritage assets and the DNLP can deliver its growth ambitions. In the meantime, we have a specific comment in relation to DNLP policy PV8 B on plan-making for strategic views.
282. The **last sentence in PV8 B** currently requires local policies to be "*consistent with*" the LVMF. This goes further than the current London Plan wording in policy HC3 and is not appropriate given the LVMF's status as guidance. We therefore propose the following amendment to that sentence:

“LPAs should ~~include~~ have regard to all relevant LVMF Viewing Locations, Protected Vistas and Protected Silhouettes in developing their Local Plans and ensure that their own policies ~~are consistent with~~ have regard to the ~~London View Management Framework (LVMF) which provides~~ detailed Visual Management Guidance in the LVMF.”

283. We also propose the following amendment to **PV8 H(2)**:

“Development in the Wider Setting Consultation Area should preserve ~~or~~ and where possible enhance, the viewer’s ability to recognise and to appreciate the Strategically Important Landmark. It should not cause a canyon effect around the Landmark Viewing Corridor or damage/detract from the viewer’s ability to recognise and to appreciate the Strategically Important Landmark.”