



## **Towards A New London Plan Consultation – G15 Response**

**June 2025**



## About the G15

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

Find out more and see our latest updates on our website: [www.g15.london](http://www.g15.london)

The G15 members are:

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

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## Position Statement

We welcome the Mayor's commitment to developing a new London Plan that recognises the scale of London's housing crises, which affects almost every part of society. 1 in 20 children, the equivalent of one child in every classroom across London, now live in temporary accommodation, which is costing local authorities over £4 million a day. The knock-on implications this has on individuals' life chances, through impacts on health, education, employment, are unacceptable.

This plan is a critical opportunity to create a delivery-focused, climate-resilient planning framework, to address some of the inefficiencies and duplication in the current plan and unlock more affordable and social homes. Importantly, it needs to achieve this goal whilst also supporting the transition to net zero.

Ultimately if London is to reach its target of delivering 88k new homes a year by 2030, this new plan must account for the current economic climate and an operating environment in which build cost inflation continues to rise, skills shortages drive up cost, we have high land value and increasing regulatory requirements; and ensure that development remains viable. Therefore, we urge the GLA to consider a careful balance between ambition and deliverability that reflects these realities on the ground.

G15 members welcome the intention to streamline this iteration of the Plan and retain its role as a high-level strategic document, which provides a clear overall framework while allowing local authorities flexibility to tailor policies to local needs. This approach is vital to ensuring that the diverse needs of communities across London are properly reflected and addressed through Local Plans. However, where additional requirements are introduced at the strategic level, particularly those relating to design or sustainability, they must be appropriately tested for deliverability. If such requirements have not been adequately assessed for viability at a local stage, developers can encounter delays, re-appraisals, and uncertainty during the planning process, risking disruption to housing delivery pipelines. A streamlined London Plan should therefore focus on setting clear priorities, while avoiding duplication and leaving space for locally informed implementation.

Members are concerned that while this intention is stated, there are certain sections of the proposed Plan that feel particularly prescriptive and burdensome. There is significant overlap between policies and legislation, which can complicate interpretation, slow delivery, and further challenge scheme viability, particularly for complex brownfield developments.

The current structure of layering policies and requirements creates a particularly onerous process for applicants, even in relatively straightforward cases. In certain cases, developers may be required to address elements from more than

45 policies in a single application, which can act as a significant barrier to delivery.

We urge the Mayor to ensure that policy complexity does not unintentionally stifle the delivery of the affordable and sustainable homes London urgently needs. A more streamlined approach, with clearer prioritisation of key requirements, would support deliverability – especially on brownfield and previously developed land, where viability is already constrained.

We welcome the Plan's ambitions on sustainability, design, and quality and, as a group, we are continually committed to creating thriving and sustainable communities. However, at present, it is simply not always viable to deliver developments in the capital that are of a suitable level of density, have a high threshold of affordable housing and meet all these new sustainable requirements.

Policies such as cycle parking provision can impact scheme viability if applied too rigidly. We understand that buildings developed today will still be in use in 2050 and beyond, and must be designed to support future climate conditions and changing behaviours. However, members are concerned that by including such prescriptive requirements in the London Plan, the delivery on specific sites may be rendered unviable. Flexibility and pragmatic application of these standards is essential to avoid hindering delivery.

It is also important to acknowledge the significant progress already made in sustainable housing delivery over recent years. As national building regulations continue to evolve, minimum standards improve, it is not necessary for overlapping guidance and regulation. In this context, the Plan should focus on enabling delivery rather than duplicating standards already being driven through regulation. Housing associations and developers are now routinely delivering homes that far exceed minimum environmental standards, with a growing track record in energy efficiency, biodiversity enhancements, and futureproofing design. Providers should have flexibility to exceed minimum standards where this better meets resident needs. We aim to, and many of us often do, go beyond compliance to address long-term affordability and reduce fuel poverty, delivering homes that are both low-carbon and low-cost to run. A framework that encourages innovation and enables providers to tailor environmental performance to local contexts and resident priorities would be a welcome and pragmatic step.

In many cases, the impacts of overlapping regulations are felt most acutely by not-for-profit developers aiming to deliver genuinely affordable, high-quality homes at scale. The Plan must therefore take a proportionate and flexible approach, recognising where national building regulations or guidance already

address core concerns, and avoiding duplication that creates additional cost, complexity, or delay.

There is an opportunity for this iteration of the Plan to provide stronger strategic leadership and clearer policy alignment across London. We recommend:

- Greater consistency with national planning policy and building regulations, particularly regarding design standards and sustainability requirements.
- Reduced borough-level variation unless clearly justified by context.
- Ensuring the plan is a strategic-level document with a focus on setting overarching priorities, rather than overly prescriptive requirements, to ensure it does not unintentionally inhibit viability and delivery.

This consistency, alongside a more streamlined London Plan, would help accelerate delivery by reducing costs, delays, and uncertainty throughout the development process. To be effective, the Plan must also promote greater consistency across boroughs in how policies are applied. Divergent interpretations risk delaying or derailing delivery and make it harder to plan and invest with confidence across London.

Members also re-emphasise the ongoing implications of an underfunded and under resourced planning systems. Accelerating the speed and certainty of the planning process must be a priority. Delays of 18–24 months to secure planning consent introduce risk and cost, particularly as schemes become subject to changes in policy, build costs, and regulatory requirements during that time. This adds pressure to scheme viability and can stall delivery. We support the Mayor's intent to streamline planning, but believe this must translate into faster decision-making on the ground, including clearer routes through PPAs, which are too often costly without delivering efficiencies.

We reiterate our view that more planners, greater resourcing for local authorities, and a more hands-on role from the GLA can help unblock bottlenecks, particularly if resources are pooled across borough boundaries. In turn, faster planning should act as a legitimate incentive for delivering higher levels of affordable housing and improved environmental outcomes.

In all, we are encouraged by the Mayor's ambition to streamline the Plan, clarify strategic priorities, and place social and affordable housing at its heart. However, as we set out in our [response](#) to the government's National Planning Policy Framework (NPPF) consultation last year, planning policy alone will not solve the capital's housing or environmental challenges. For the revised Plan to be effective, it must be underpinned by sustained investment, targeted infrastructure funding, and deepened collaboration between the GLA, boroughs, housing associations, and the private sector.

## Section by Section Response

### *Paragraph 2.1: A brownfield first approach*

We support the Plan's commitment to a brownfield-first approach to housing delivery, recognising that underused and well-connected sites are essential to delivering affordable homes at pace.

To realise this ambition, these sites must be properly supported through continuous investment in transport infrastructure and adequate funding to unlock their full potential. These sites often come with significant constraints, including contamination, complex ownership, and high remediation or demolition costs that make development more expensive and complex than on greenfield land. Without the right enabling infrastructure, their full capacity cannot be realised. Transport connections in particular are key to unlocking higher densities and making sites viable for affordable and low-car developments.

Moreover, we note that viability challenges remain significant – in particular, issues associated with existing use value remediation costs can cause barriers to bringing [small] sites forwards. Addressing these challenges may require a more structured approach to assessing viability, including clear frameworks and targeted support measures.

Members are also pleased that DESNZ are consulting on a review to the current Biodiversity Net Gain approach on brownfield development, in a bid to improve viability.

### *Paragraph 2.3: Opportunity Areas*

We support the review and streamlining of Opportunity Areas (OAs). To be successful, Opportunity Areas must embed long-term governance, accountability, and placemaking from the outset. Partnerships between the public and private sector, backed by organisations capable of convening local authorities, infrastructure providers, and Homes England, will be essential. We see value in exploring an independent delivery body, such as a Mayoral Development Corporation, where appropriate.

Early investment in infrastructure and social facilities will require government support and land value capture mechanisms to de-risk delivery and support long-term stewardship. Engagement must begin with local principles and cultural insight, with design consultation at a neighbourhood level.

The Plan rightly acknowledges that fully realising the housing potential of OAs will depend on delivering key enabling infrastructure, such as the proposed DLR extension to Thamesmead and Abbey Wood, and the Bakerloo Line extension. These areas offer the scale and strategic location to support significant new

housing, but they also require coordinated investment and mechanisms beyond the planning system to overcome longstanding delivery barriers.

We welcome the Plan's support for New Towns as a strategic solution to London's housing crisis and agree that they must be targeted in areas where they can deliver the greatest social and economic benefits. Thamesmead exemplifies this potential – its scale, location, and public landownership present an opportunity to deliver large-scale, sustainable regeneration that responds directly to London's acute housing need. We therefore strongly support the retention of Thamesmead and the Abbey Wood Opportunity Area. Continued focus and investment here is essential, and we encourage the GLA and Taskforce to explore additional sites with similar capacity to drive long-term growth and inclusive place-making across the capital.

It will be important that any new London Plan recognises the unique and complex (and often competing) challenges associated with the delivery of complex OAs. For example, some earlier phases of development within OAs may need identification and a balance to be struck between various competing planning policy objectives. A clear direction should be included in future OA London Plan policy to provide clarity and direction to both developers and LPAs accordingly.

#### *Paragraph 2.6: Industrial land*

While members support the continued protection of industrial land, we note the ongoing challenges in delivery. Therefore, we encourage a more qualitative approach to assessing supply, particularly for light industrial and workspace provision. Co-location remains difficult to deliver in practice, especially where industrial uses are not compatible with adjacent residential homes due to noise, access, and operational constraints. Rather than relying on a numbers-based floorspace target, we recommend focusing on market-led, well-designed spaces that are genuinely lettable and reflect occupier needs. Land swaps may be a more effective strategy, delivering high-quality industrial uses in suitable locations alongside well-integrated residential development elsewhere.

#### *Paragraph 2.7: Wider urban and suburban London*

A more consistent national approach to setting expectations for the scale of development in accessible urban locations is welcomed, however, this should be grounded in local context. A reasonable benchmark might allow for development that is 100 to 150 percent denser than the prevailing context, with further flexibility based on design quality and rationale. While design codes and guidance can support clarity and certainty, they must not be treated as tick-box exercises or override the value of meaningful planning dialogue. Rigid application of standards, particularly in relation to unit mix, dual aspect, tall

building guidance, separation distances, commercial re-provision, and cycle parking, often reduce capacity and undermine scheme viability, especially in suburban and outer London boroughs. We would welcome greater national policy emphasis on flexibility in applying these standards, including in small site development and when re-provision of uses such as car parking would otherwise limit housing delivery.

*Paragraph 2.9: Beyond London's existing urban area*

Members support the Mayor's openness to a more evidence-based and nuanced approach to the Green Belt. We recognise its role in preventing urban sprawl and in providing access to nature, recreation, and climate resilience. However, given the scale of London's housing crisis, we believe the Plan must do all it can to remove unnecessary barriers to housing delivery.

A review of Green Belt land should identify sites that are underused and of low-quality and consider how they could contribute to sustainable development where appropriate. Crucially, we support the principle outlined in the NPPF that any Green Belt release should be subject to a minimum 50 per cent affordable housing requirement. To support this ambition, the GLA should consider how targeted grant funding might be deployed to unlock delivery on appropriate Green Belt sites, especially where viability constraints could limit otherwise policy-compliant schemes. This would need to be deployed carefully to avoid distorting land values. However, a transparent and criteria-based approach to discretionary funding could provide developers with greater certainty, support strategic outcomes, and enable land that is currently underused to contribute meaningfully to meeting housing need.

We believe similar principles should also apply to Metropolitan Open Land (MOL) and this view is discussed further under paragraph 2.11. MOL plays an important role in delivering green infrastructure across the capital, but some sites make a limited contribution and should be reviewed to assess their ongoing value. The London Plan should take a strategic approach that balances protection with the acute need for new homes.

Meaningful community engagement will be vital in delivering new development in these areas where land supply has been constrained. Local voices must be heard, but there must also be a clear message from City Hall that addressing London's housing shortage is a shared priority, and that delivering well-designed, sustainable, and affordable homes is firmly in the public interest. As part of this, new developments could incorporate well-designed communal green spaces that enhance local amenities and provide accessible, high-quality open areas for both residents and the wider community.

*Paragraph 2.10: Large-scale urban extensions in the green belt*

We welcome the Mayor's openness to a more evidence-based and nuanced approach to the Green Belt. We recognise its role in preventing urban sprawl and contributing to access to nature, recreation, and climate resilience. However, given the scale of London's housing crisis, we believe the Plan must do all it can to remove unnecessary barriers to delivery. A review of Green Belt land should identify underused and low-quality sites and consider how they could contribute to sustainable development where appropriate.

We strongly support the principle that any Green Belt release should be subject to a minimum 50% affordable housing requirement. To support this ambition, the GLA should explore how targeted grant funding might be deployed to unlock affordable delivery on appropriate Green Belt sites, especially where viability constraints would otherwise stall progress. This funding must be managed carefully to avoid inflating land values, but a transparent, criteria-based approach could create greater certainty and enable underperforming land to contribute meaningfully to meeting housing need.

Alignment between the GLA and Homes England on the principle of additionality is also critical. As housing associations, we are committed to maximising affordable housing where viable, but to do so, the system must offer the right levers.

The Plan should explore mechanisms that reward ambition, such as faster decision-making for high-affordability schemes, enhanced access to infrastructure funding, or prioritisation in public land disposal. These incentives would support delivery beyond minimum thresholds and reinforce the value-driven role of not-for-profit providers.

In this context, we support the Mayor's exploration of a New Town in the Green Belt, where there is existing, or deliverable, public transport access. Done well, this could form part of a strategic solution to London's acute housing need. BusinessLDN's 2024 report highlighted the capital's unique governance structures, including the London Plan and the Mayor's powers over development corporations and transport, as a strong foundation for such an initiative. With 60% of London's Green Belt located within 2km of a rail or Tube station, and a significant overlap with Opportunity Areas, there is clear potential to pursue this bold and considered approach where it aligns with sustainable growth, infrastructure capacity, and wider regeneration goals.

#### *Paragraph 2.11: Metropolitan Open Land*

We support the inclusion of a Metropolitan Open Land (MOL) review within the London Plan and believe it should apply the same strategic, evidence-based approach as with Green Belt land. MOL plays an important role in delivering green infrastructure and access to nature across the capital, but some sites, such as underused golf courses or fragmented parcels, make a limited

contribution to its core objectives. These sites should be reviewed to assess their ongoing value, with a focus on identifying well-located areas with good transport access that could help meet London's housing needs.

The London Plan should take a balanced approach that protects genuinely valuable MOL while enabling sustainable development where appropriate. As with the Green Belt, we support applying a minimum 50% affordable housing requirement to any MOL release. A coordinated and transparent review, underpinned by meaningful community engagement, will be essential to build public trust. Local voices must be heard, but there must also be a clear message from City Hall that addressing London's housing shortage is a shared public priority, and that delivering well-designed, inclusive neighbourhoods is in the public interest. As part of this, new developments could incorporate well-designed communal green spaces that enhance local amenities and provide accessible, high-quality open areas for both residents and the wider community.

#### *Paragraph 2.12: Affordable housing*

We welcome the renewed emphasis on genuinely affordable housing and the proposal to give greater weight to social rent within planning decisions. If affordable housing is to be treated as a clear priority, this must be reflected in the way competing policy objectives are managed. Enhanced design and sustainability are of course of significant importance, and we want to support these ambitions wherever possible. However, we need to ensure that in striving to achieve ambitious standards we are not unintentionally impacting the delivery of social and affordable homes, via viability concerns.

Members support the principle that 50 per cent of housing on green belt land should be affordable. We also agree that LPAs should have greater flexibility over tenure mix. A range of affordable housing types must be considered, including supported housing, older people's housing, accessible homes, and temporary accommodation, to respond to acute and varied local need. To enable delivery, measures such as retaining the affordable housing exemption from CIL (with clawback mechanisms), and revisiting the structure and timing of grant funding, should be considered.

#### *Paragraph 2.13: Planning for affordable housing*

As social landlords, we always want to maximise the amount of affordable housing delivered in the capital and will always seek to deliver the highest level of social housing as possible (within viability assessments). We support the continued use of the affordable housing threshold approach to fast-track applications, which has provided welcome clarity and consistency, and therefore we do not support a review of the current affordable housing thresholds. We feel these exist to ensure that all developments in London, whether developed

by a private developer, housing association, or local authority, deliver the homes that Londoners really need. In the face of acute affordable housing need, maximum delivery must remain the expectation, particularly from not-for-profit developers.

Notwithstanding, we acknowledge the ongoing challenges of delivering affordable housing. Spiralling build costs, skills shortages, delayed planning processes and increasing regulations have meant that developments with high affordable delivery are often rendered unviable. This is a particular challenge when developing on brownfield, industrial and other previously developed sites. These sites are often more complex and costly to develop due to contamination, remediation, or infrastructure needs. Viability concerns, however, should not become a route for reducing affordable provision, especially by those not committed to long-term social value.

Therefore, while the 50% target may be appropriate on green or grey belt land, a more flexible approach is necessary for assessing public land within existing urban areas to ensure sites remain viable and continue to come forward. A nuanced application of the threshold approach, informed by viability and deliverability, would support the policy's aims without compromising progress. Additionally, we would support efforts to streamline and standardise viability review mechanisms in S106 agreements, particularly where the fast-track route applies, to reduce delays and improve certainty in affordable housing delivery.

Flexibility in tenure mix is also important to reflect local needs and constraints, but any review of thresholds must avoid undermining the ambition to maximise affordable homes.

Given the Government's stated aims of boosting affordable housing, including the NPPF's preference towards social rent, members feel strongly that adequate grant support should be made available for developments on public land in order to achieve the 50% threshold and unlock new sites. For example, Peabody are delivering 60% affordable housing on both the Holloway Prison and St Ann's Hospital sites in London, publicly owned land that was brought forward with the support of substantial grant funding. These outcomes would not have been achievable without that investment, underscoring the vital role capital grant plays in turning public land into high-impact, affordable-led development. Targeted funding of this kind should be a cornerstone of efforts to unlock sites and maximise social value across the public estate.

#### *Paragraph 2.14: Estate regeneration*

We support the principle that estate regeneration schemes should aim to replace social rent floorspace, regardless of residents' individual right to return. This is a vital commitment to ensuring long-term affordability and retaining strong, mixed communities with social housing across London. We recognise the

right to return as a fundamental aspect of trust and fairness in the regeneration process, and work should be done to ensure that residents are meaningfully consulted and engaged from the earliest stages of planning through to delivery.

Regeneration offers the opportunity to deliver real improvements in the quality, safety, and sustainability of homes. However, these schemes are often complex and reliant on a balance of funding mechanisms, including cross-subsidy from private sales. In this context, it is essential that policy ambition is matched with deliverability. Without sufficient flexibility, there is a risk that regeneration becomes unviable or overly reliant on high-density, high-rise solutions that may not always be appropriate or supported locally.

We therefore support in principle any policy that helps guarantee the right to return, while encouraging a pragmatic, place-sensitive approach that enables high-quality regeneration to come forward.

*Paragraph 2.17: Specialist and supported housing and housing London's older population*

We welcome the Plan's recognition of the importance of supported and specialist housing. Accelerating the delivery of homes for older people brings broad benefits by reducing pressure on health and care services as well as promoting independence, wellbeing, and choice in later life. These homes also play a critical role in the broader housing life cycle. By enabling older people to downsize into high-quality, age-appropriate accommodation, they help free up larger family homes – now among the most difficult and expensive to bring forward in London. This chain effect makes the delivery of specialist housing a strategic lever for unlocking capacity across the system.

However, these homes remain some of the most difficult to deliver under current planning policy and funding frameworks. Targeted support will be essential to meet growing demand and ensure supply keeps pace with demographic change.

Members recommend:

- Flexible application of space and design standards, especially for older people's housing.
- Enhanced training for planning officers to understand the value and needs of supported housing.

Some members are concerned that introducing a new planning use class could further hinder the delivery of supported housing. Key challenges include:

- The rigidity of planning classifications, which often fail to accommodate many supported housing schemes.

- A lack of detailed understanding within planning departments, making it difficult to assess the specific needs of such developments.
- Public consultation processes, such as planning applications, which may be inappropriate for certain types of supported housing.

*Paragraph 2.19: Gypsies, Travellers and Travelling Showpeople*

Green Belt land is likely to be highly suitable for use by Gypsies and Travellers who wish to establish a permanent home. The exploration of grey belt land could provide more choice in where Gypsies and Travellers can live, improve equality of opportunity, speed up the planning process to reduce the length of temporary permissions, and help local authorities, housing associations, and other social housing providers to develop appropriate accommodation/caravan sites for Gypsies and Travellers.

In assessing the future need of accommodation for Gypsies and Travellers, we would welcome:

- More robust consultation with families currently living in bricks and mortar to determine whether they would prefer to relocate to living in a caravan.
- More robust consultation with Gypsies and Travellers residing on their own land, or those proposing to purchase land, within the Green Belt
- Improved location of caravan sites to reduce health inequalities.
- Consultation with Gypsies and Travellers as well as local communities to ensure sites are sustainable economically, socially, and environmentally.
- Consideration of the history of Gypsies and Travellers to residing in an area.

*Paragraph 3.9: Access to employment*

As housing associations, we are well placed to support inclusive growth, skills development, and employment support across London, drawing on our networks and connections across a range of sectors and industries. Our developments create jobs in construction and long-term housing management, and we support the principle of planning obligations that deliver wider social and economic benefits, including employment and training opportunities.

We would welcome a London-wide brokering arrangement to support skills development by coordinating training pathways and enabling practical on-site experience across multiple development sites. A more consistent offer across boroughs would help address sector-wide skills shortages and ensure local residents can access employment opportunities linked to housing delivery. However, developer contributions to support employment and training must be

approached strategically and transparently, ensuring they are balanced appropriately alongside affordable housing and infrastructure obligations. A clear, pan-London framework for prioritising and pooling contributions would give delivery partners greater certainty while helping to align housing, skills, and growth objectives. We also encourage the use of tools such as Health Impact Assessments and Social Value Strategies to help ensure developments deliver broader benefits for communities.

#### *Paragraph 4.1: Building height and scale*

London's approach to building at height must reflect its unique urban character and lower density compared to many global cities. While we understand the need to optimise land use and that tall buildings will continue to play a role, they are not the sole solution. Much of the policy direction risks pushing developments to become overly dense and too high. The primary concern is cost, both of construction and long-term maintenance and ownership, which can undermine viability and quality. The Building Safety Act has created a significant barrier to mid-rise development. Schemes designed near the 18m threshold face heightened safety regulations and approval uncertainties, limiting mid-rise growth in the short-term and forcing many schemes to either stay well below 18m or jump to much taller buildings.

Our experience is that high-density, high-rise developments are often more complex and expensive to maintain, with a shorter lifespan and poorer long-term outcomes for residents. As a result, some members are cautious about developing tall buildings due to a lack of clarity over what is considered an appropriate height (see paragraph 4.2) for a particular location and occupant group. With the right design and infrastructure, medium-rise development offers a cost-effective and more easily deliverable alternative to high-rise typologies. However, achieving high architectural and environmental standards in taller buildings will be critical to ensuring they positively contribute to both local and citywide environments. As noted, delivering these standards presents cost and viability challenges, which must be addressed to avoid unintended constraints on development, particularly for the social housing providers.

In this context, we believe the Plan should place greater emphasis on soft, appropriate, gentle density, delivering high-quality, medium-rise, family-friendly housing with strong placemaking at its core. This can support similar levels of residential density as taller schemes, while creating more liveable, neighbourly communities that feel safe and inclusive. Soft density enables better integration with existing neighbourhoods and access to open space – key ingredients in building places people want to live and stay.

Therefore, we think in line with emerging policy direction from the GLA and models seen in other European cities, mid-rise development should be

prioritised, particularly where supported by adequate transport infrastructure. However, there is a fine balance to be struck to preserve London's "city of villages" character and avoid excessive uniformity in building height. While medium-rise is broadly preferable, some members highlight that a careful mix of medium and high-rise development can still deliver cohesive communities and successful placemaking, provided schemes are sympathetic to local context and design principles. On that basis, we welcome the Plan's commitment to distinguishing between different forms of tall buildings and encourage a more nuanced evaluation based on design quality, local character, and infrastructure capacity.

#### *Paragraph 4.2: Tall Buildings*

We support the inclusion of clearer guidance around what constitutes a tall building, including minimum height thresholds where appropriate, particularly in outer London or grey belt locations can give greater confidence to deliver homes. However, we recognise that height thresholds for inner London boroughs could be less helpful, where local context varies significantly and that context should remain the primary driver of design and scale.

A single, London-wide policy on tall buildings would provide greater clarity and consistency, particularly for developers operating across borough boundaries. This policy should recognise the different types of tall buildings, for example, distinguishing between 10- and 20-storey buildings, and be clear about their characteristics. A typology-based approach could help increase design confidence and streamline delivery. While a degree of local flexibility is important, having a consistent framework for how boroughs define and assess tall buildings would ensure a more predictable planning process.

We also encourage an approach that identifies where tall buildings will be acceptable at the strategic level, particularly in Opportunity Areas that can make a substantial contribution to meeting the capital's needs.

#### *Paragraph 4.3: Supporting a denser London linked to transport connectivity*

The principle of optimising density in well-connected locations is fundamental to sustainable growth. We welcome updates to PTAL ratings that account for journey times via sustainable modes, ensuring a more accurate reflection of accessibility and supporting better utilisation of existing transport networks. Continued investment in infrastructure remains critical to unlocking new development opportunities.

Securing funding for upgrades and extensions to transport infrastructure is essential in this regard, enabling significant housing delivery in some of London's last remaining areas with capacity for substantial growth. Prioritising this

investment will help realise untapped potential before any consideration is given to releasing Green Belt land.

#### *Paragraph 4.4: London's heritage*

We support adherence to national policy and guidance on heritage to avoid duplication and overlapping regulation within the London Plan. The protection and enhancement of London's heritage assets is important, but this must be balanced with the need to adapt and retrofit buildings to meet sustainability and energy efficiency goals.

With 30% of London's homes built before 1919, there is an urgent need to upskill the workforce in heritage retrofit. We support the use of Local Skills Improvement Plans (LSIPs) to align training provision with local employer needs and encourage the Mayor to work with government and training providers to expand retrofit training, particularly where demand is highest. National standards such as PAS 2035 and area-based retrofit programmes should be promoted, enabling place-based approaches that build local demand, match supply to need, and give businesses the certainty they need to invest in skills and capacity.

#### *Paragraph 4.5: Designing the homes we need*

Members recognise that the London Plan will opt into the National Described Space Standard and contain further minimum ceiling height requirements and private outside space standards. We urge that any standards set out in guidance beyond this should be best practice and assessed along with housing delivery, site optimisation and viability considerations.

We supported the intention to provide greater clarity around when single-aspect homes may be appropriate. It is right that design guidance evolves to reflect practical delivery challenges and the changing understanding of building performance. However, while additional guidance is welcome, it is important to balance this against reverting to the past when single-aspect homes were widespread, as this posed challenges in terms of daylight, ventilation, and overall habitability.

Overheating remains a significant concern, and orientation and a lack of opportunities for cross-ventilation play an important role in how habitable homes will continue to be. However, we would question whether the current policy on avoiding solely north-facing homes remains as relevant today, particularly given the poor performance of some south-facing flats in terms of overheating risk. A more nuanced and evidence-based approach (one that considers factors such as view quality, ventilation, and solar gain) would be welcome to ensure that design standards remain appropriate, proportionate, and do not unintentionally constrain otherwise good-quality schemes.

#### *Paragraph 4.6: Heat risk, ventilation and overheating*

Members support the GLA's emphasis on passive design solutions to address heat risk and overheating. Designing out the problem from the outset, rather than relying on mechanical interventions, offers benefits in terms of whole lifecycle cost, long-term sustainability, and resident comfort. Mechanical ventilation and cooling systems can significantly increase capital and operational costs, particularly for affordable housing providers, and may also present long-term maintenance challenges.

We support minimum standards for overheating mitigation in all refurbishments, including passive ventilation and solar shading (where proven necessary), alongside delivery milestones and funding support for borough-wide retrofit programmes in partnership with housing associations. Nature-based solutions such as trees, open spaces, and green roofs should be prioritised to reduce climate risks and enhance wellbeing.

We also think it is sensible that bespoke policies on heat risk and ventilation are removed from the London Plan, with national building regulations used as the primary mechanism for compliance. This would help ensure consistency, reduce duplication, and provide greater clarity for developers and boroughs alike.

Members also welcome the GLA's focus on considering the whole-life benefits of overheating reduction strategies. A whole life-cycle approach helps to ensure that solutions are both immediately environmentally responsible and financially sustainable over the long term.

#### *Paragraph 4.7: Homes for families*

There is an acute need for family sized homes in the capital and members support the renewed focus on delivering family housing, particularly in a way that responds to the needs of children and young people. Unfortunately, it is becoming harder to deliver family sized homes due to increasing costs. Uplifting grant rates for larger, family sized homes would be a meaningful step towards enabling more of this provision.

The design process is highly iterative, especially when working to habitable room targets, so greater clarity and consistency in definitions of family housing would help deliver better outcomes. Some boroughs define this as two-bed homes, others as three, which leads to inconsistency in expectations. It would be helpful for the GLA to provide guidance on what constitutes family housing, while still allowing boroughs to set targets based on local need.

#### *Paragraph 4.8: Accessible housing*

We support the ambition to improve the provision of accessible housing across tenures, as the current approach does not consistently meet the needs of end

users. However, it is important that any changes to standards remain proportionate, practical, and responsive to demand.

We would welcome further clarity on how this would apply to non-self-contained housing, such as co-living or supported housing schemes, where the design and functionality can differ substantially from standard housing models. A more tailored and flexible approach to accessibility standards in these contexts may be necessary to avoid unintended consequences or unviable schemes, ensuring that requirements align with the realities of delivery and resident needs.

*Paragraph 4.9: Space standards and other requirements*

We continue to support the emphasis on delivering healthy homes and places, and we recognise the importance of space standards in securing a good quality of life for residents. Ideally, however, we would prefer alignment with national standards to avoid duplication and the layering of additional regulatory or guidance requirements that can add complexity and cost to developments in London.

That said, we acknowledge the unique challenges of building at higher densities in the capital, particularly around ensuring adequate daylight, sunlight, and ventilation. These are vital components of liveable homes and should remain a core consideration in design, especially as schemes become more compact and land constraints more acute.

Additionally, a flexible, London-wide approach towards private amenity spaces should be considered, as the ability to provide policy-compliant outdoor space can be constrained by environmental factors such as noise and air quality. In some cases, London Boroughs are supporting larger unit sizes as an alternative to traditional private amenity spaces alongside solutions such as Juliet balconies that still offer access to fresh air while enhancing internal living areas.

*Paragraph 4.10: Designing for everyone*

We support the principle of designing for everyone, but there is a need for clarity around how this is defined and integrated within the existing planning framework. Without a clear and shared understanding, there is a risk that interpretation will vary across boroughs, potentially leading to inconsistency, delays, and additional burdens for applicants.

While design review panels can play a helpful role in improving outcomes, it is essential that the planning process remains responsive and proportionate, particularly in boroughs where capacity is already stretched. A consistent, well-defined approach would support delivery while upholding inclusive design principles.

## **5 - Sustainability, Design, and Delivery**

We welcome the Plan's strong commitment to climate action, net zero homes (in operation), and climate resilience, while urging a careful balance between ambition and deliverability that reflects the realities on the ground. Housing associations have a growing track record in energy efficiency, biodiversity enhancements, and futureproofing design. We often go beyond compliance to deliver homes that are both low-carbon and low-cost to run, addressing long-term affordability and fuel poverty.

Design-led approaches remain important, but the Plan must ensure that design standards do not hinder the delivery of affordable homes. All measures should protect scheme viability by being phased, proportionate and aligned with national regulations (wherever possible), thereby reducing administrative burdens without compromising ambition. We advocate a flexible approach – for example, integrating enhanced standards such as Passivhaus, to support innovation and ensure that providers can exceed minimum requirements where appropriate, while safeguarding viability.

To drive effective climate adaptation, we recommend standardising climate data and modelling tools across boroughs and encouraging investments in measures like flood defences and passive cooling through grants or planning incentives. Furthermore, a sustainable housing delivery strategy should embed opportunities for local skills development and employment via a city-wide programme that supports apprenticeships, training pathways and good quality green jobs in construction and maintenance. Leveraging planning obligations and resourcing boroughs to broker meaningful local opportunities will further boost inclusive economic growth and build the skilled workforce needed for rapid net zero home delivery.

### *Paragraph 5.1: Energy efficiency standards*

We support the Plan's ambition to raise energy efficiency standards to help achieve London's net zero goals. However, this must be balanced with a pragmatic approach that recognises the constraints of some sites. In cases where on-site measures are technically or financially unfeasible, the Plan should provide flexibility for verified off-site solutions – in addition to the existing option to contribute to carbon offsetting funds – such as borough-wide retrofit schemes or investment in district-scale renewables. These can deliver equivalent or greater carbon savings, while also supporting wider system decarbonisation and local green jobs. A clear, criteria-based offsetting framework would help maintain viability for complex schemes while ensuring developments contribute meaningfully to London's overall carbon targets.

We would recommend a London-wide social housing retrofit accelerator and carbon reduction partnership fund to support this activity.

### *Paragraph 5.2: Heat networks*

We support alignment with national regulations on heat networks while encouraging a nuanced, flexible approach that reflects existing local provision and emerging technologies.

While the Plan's focus on heat networks is welcome, we call for a more coordinated, clearly articulated strategy. Housing associations and councils manage hundreds of small heat networks, and some members support integrating these into larger, district-level systems. A GLA-led roadmap with clear timelines, defined priority areas and enhanced collaboration between asset owners is essential to improve efficiency and network connectivity.

However, we caution against mandatory connection requirements for all new developments, especially for highly efficient homes built to PassivHaus or similar standards, where decentralized heating may prove more appropriate, sustainable, and beneficial for residents. Flexibility in policy will encourage innovation while promoting overall system efficiency.

### *Paragraph 5.3: Whole life-cycle carbon (WLC) and Circular Economy (CE)*

We support the ambition to incorporate WLC and CE principles into planning assessments, particularly for regeneration schemes where decisions around demolition or retention have significant embodied carbon implications. Introducing WLC and CE benchmarks could encourage more sustainable design choices, promote the reuse of materials, and reduce waste, contributing to London's climate goals. However, we caution that such frameworks need to be carefully calibrated to avoid unintended consequences that might hinder development viability or create excessive complexity for developers and LPAs. Clear guidance, consistent methodology, and industry support will be essential to ensure benchmarks are meaningful, achievable, and drive genuine sustainability improvements without disproportionately increasing costs or delays.

### *Paragraph 5.5: Green and open spaces*

Members suggest that discussions on green and open space should focus not just on access but on its quality and resilience. With green spaces, both within new developments and across the city, facing increasing pressure, there is concern that without clearer standards, they may not effectively deliver the intended social, health, and environmental benefits.

If metrics are to be brought in to assess the quality of green space, these should be London-wide.

### *Paragraph 5.7: Green infrastructure and biodiversity*

We support the intention behind the Urban Greening Factor (UGF) and biodiversity net gain (BNG) requirements and recognise their role in improving climate resilience and wellbeing. However, we would welcome greater flexibility in how these policies are applied, particularly on constrained, high-density (e.g., single tall building) or brownfield sites where delivery on-site may be limited. Adapting greening standards to allow innovation, including the ability to deliver biodiversity improvements across wider estates or through off-site enhancements in existing stock, would lead to more widespread and meaningful outcomes and better value.

We also encourage the GLA to promote co-designed green infrastructure projects with residents to ensure green space is usable, context-sensitive, and capable of supporting community resilience. This is especially important in existing neighbourhoods where space is limited and where targeted interventions can significantly enhance local biodiversity and quality of life.

Members are pleased that DESNZ are consulting on a review of the current Biodiversity Net Gain approach on brownfield development, in a bid to improve viability.

*Paragraph 5.12: Transport's role in London's growth and Paragraph 5.13: Sustainable transport networks to support growth*

We strongly support the Plan's emphasis on aligning housing growth with high public transport accessibility, which is essential for reducing carbon emissions, enhancing connectivity, and supporting sustainable communities. Locating homes around transport hubs is key to unlocking development capacity, higher densities and reducing emissions. Embedding affordable housing within transport-rich locations not only enhances connectivity but also supports equitable access to opportunity.

We encourage the Plan to go further by ensuring that active travel infrastructure, including walking and cycling routes, is embedded within affordable housing developments from the outset. Integrating this infrastructure alongside public transport access supports models of low-car, family-friendly living and helps reduce car dependency while maintaining a high quality of life for families.

In addition, we support the Mayor's efforts to secure long-term Government investment in transport infrastructure for vital projects like the DLR extension to Thamesmead and the Bakerloo Line extension. These initiatives are critical to enabling sustainable growth, unlocking new housing opportunities, and delivering a more connected London. We hope the London Plan will provide further clarity on how housing delivery will align with these infrastructure initiatives to ensure coordinated and effective growth. Clearer integration between planned transport improvements and development locations would help maximise their impact in creating successful and sustainable communities.

*Paragraph 5.14: Car parking, cycle parking and deliveries*

We support the Plan's ambition to promote sustainable transport. Locating new homes in areas with strong public transport links is crucial to this. Equally, the approach to car parking policy needs to be more responsive to local context in order to aid delivery, particularly in outer London boroughs where there are lower public transport accessibility levels and stronger resident expectations around car ownership.

We would support a revision of the strategic London-wide approach to car parking, alongside clearer national guidance. Members regularly encounter conflicting requirements, where boroughs require parking provision or reprovision, while GLA policies discourage it in line with sustainability objectives. This lack of clarity creates delays, increases cost, and risks undermining viability, particularly on small and medium-sized brownfield sites. A more consistent, flexible policy approach – prioritising housing delivery on accessible sites and clarifying which standards take precedence – would improve certainty and support better outcomes.

On cycling, we back the promotion of active travel, but more flexibility is needed in how much and where cycle parking is delivered. In addition to viability concerns, on constrained sites, cycle parking provision can create challenges in optimising residential accommodation. A flexible approach should aim to balance housing delivery with cycle parking requirements that reasonably reflect local demand.

Current cycle storage standards can conflict with good placemaking and ground floor activation, particularly in high-density schemes. Digging basements to store bikes raises concerns around cost, embodied carbon, and practicality. We would welcome clearer guidance supporting varied and strategic forms of cycle parking, including external hangars and secure communal options, which are safe, accessible for all and space efficient. In addition, TfL should consider further incentives to encourage cycling uptake, particularly in housing estates where concerns such as bicycle theft deter residents from choosing cycling as a preferred mode of transport.

Delivery and servicing infrastructure should also be better integrated at the design stage. With rising demand for home deliveries, planning policy needs to support practical and well-located delivery facilities that do not compromise public realm or active frontages.

*Paragraph 5.16: Fire safety*

We support the GLA's position of aligning with national fire safety guidance and the outcomes of the Grenfell Inquiry. A consistent approach across boroughs is essential, and we welcome clarity in the Plan that reinforces the application of

national standards. This consistency helps reduce delays and ambiguity in the planning process while ensuring resident safety remains paramount.

*Paragraph 5.17: Air quality*

Members support the Plan's ambition to improve both outdoor and indoor air quality and recognise the role of the planning system in mitigating harm and supporting long-term public health outcomes. However, we recommend greater flexibility and clarity on strategic priorities to allow for innovation and to reflect the practical challenges of implementation. For instance, the suggested requirement of connecting construction sites to mains power would be difficult to commit to at the planning stage, as decisions on generator use are typically made later in the development process.

We welcome the Mayor's suggestion to introduce ambitious, but achievable air quality benchmarks and support a simplified, threshold-style approach that incentivises compliance while reducing burdens on applicants. Clearer benchmarks and streamlined processes will improve certainty and help embed air quality outcomes in a more proportionate and deliverable way.

*Paragraph 5.18: Heat risk*

We recognise the importance of addressing heat risk, particularly as climate change increases the likelihood of prolonged extreme temperatures. The testing methodology and the practical steps required for compliance should be clear and make it as easy as possible for developers and housing providers to plan or respond effectively. We recommend that the GLA aligns with national guidance and building regulations to ensure consistency and clarity across the sector.