TOWARDS THE LONDON PLAN

Centre for London Consultation Response

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CENTRE FOR LONDON

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1.1 What is the London Plan?

N/A

1.2 What years will the new London Plan cover?

N/A

1.3 How many homes will it plan for?

London is the epicentre of the national housing crisis. The city faces unique challenges — housing delivery and historic homelessness pressures unlike anywhere else in the country. While the Government's planning reforms and recent funding decisions have enabled the built environment sector to pursue a more optimistic, future-facing strategy of development, these changes are necessary but not sufficient to deliver the scale of change needed. Centre for London welcomes the ambitious housing targets set by the Government, and the clear motivation needed to increase supply. However, we believe that there are clear challenges of viability, affordability, tenure and design which are restricting the impact of planning reforms and target-setting.

Centre for London is the capital's independent think tank. We are dedicated to researching the city's critical issues. We bring together London's citizens, experts and leaders to discuss, develop and implement the policy solutions to tackle them. While we recognise the important role of the London Plan in setting a strategic framework for the London housing system as whole, in reality, London is complex and composed of multiple markets. The implications of rapidly increasing housing supply to meet targets will have a particular and greater impact on the development profile of Outer London, particularly in terms of increased density, taller buildings, and increased tenure diversity. The city's subregions are home to varied socio-economic profiles and spatial priorities. There are also unique cross-boundary considerations, where the capital's housing market impacts housing supply and demand across the wider South East.

Therefore, Centre for London recommends that the London Plan's language reflects these differences and recognises that a regional housing market, while a fair description in geographical and planning terms, is does not truly reflect the diversity of the housing markets across different parts of the city and in the wider South East. While the London Plan provides geographical classification for planning purposes, such as Inner and London or specific sub-regions, there is merit in reinforcing these with planning guidance which supports the Mayor's vision for strategic development while recognising deeper challenges and opportunities in the sub-regions and at the boundaries. This could include more sub-region-specific guidance on industrial development for areas with a greater density of industrial businesses such as West London, or for increasing small site density in areas with fewer high-rise buildings such as South London.

1.4 Viability and delivery

Viability is a major challenge for London's housing sector and it is crucial that the new London Plan reflects how the current planning system, and the Government's ongoing programme of reforms, can only go so far to address this challenge. Centre for London has previously, and continues to, advocate for local government planning departments to be suitably resourced to speed up the planning process. In our Homes Fit for Londoners report[i], we recommended the establishment of greater levels of shared resource between the GLA and boroughs, including a funded 'flying squad' to specifically support planning departments on the issue of viability and alignment with the London Plan.

While targeted interventions by the Mayor of London, such as the £100m Housing Kickstart Fund and existing Fast-Track Route, are positive ways to improve viability at the planning stage, this does not directly impact on viability challenges faced in the wider market. As many of the housing sector's challenges in delivering viable developments are outside of the control of the GLA, the new London Plan should ensure its existing Fast-Track Route policies are demonstrating effective rates of delivery, while seeking to broaden their definition in line with the proposed changes to affordable housing thresholds. The Government has made planning reform one of its key areas for driving economic growth – it is incumbent on the new London Plan to embody this and streamline the planning process wherever possible.

1.5 What is this document about?

N/A

1.6 Legal and procedural requirements

N/A

1.7 Integrated Impact Assessment (IIA)

N/A

1.8 Habitats Regulations Assessment (HRA)

N/A

1.9 Beyond London

The new London Plan will emerge at a time of immense change for local government in England. London's governance has led the country in its approach to strategic regional planning and economic development. It is likely that when the new London Plan is published in full, Greater London will be surrounded by several newly merged unitary authorities and as many as five or more combined authorities, each with strategic planning powers which resemble London's own system. Therefore, it is crucial that the new London Plan is designed to reflect this emerging landscape and work closely with other combined authorities across the South East to align on housing and planning policies which boost growth, housing supply and the wellbeing of residents.

Centre for London has long advocated for a new approach to strategic planning which ensures greater collaboration between the GLA and South East local authorities. In our 2024 report on London and the Heathrow Region[ii], we found that economic growth which centres on transport corridors or major industrial hubs is reliant on close collaboration across council boundaries, which can be undermined by a lack of communication, engagement or political direction. For the Mayor's vision for Good Growth to be integrated into the planning system, there must be recognition that Greater London is both a leader and partner in a wider system.

Nowhere is this collaboration more prescient than in transport connectivity and the Government's proposals for new towns in the commuter belt. In our response to the Government's consultation on the National Planning Policy Framework (NPPF) in 2024[iii], Centre for London recommended that national government identifies local authorities in the wider South East which should be encouraged and supported to work alongside the GLA on delivering housing in transport corridors and surrounding regional transport hubs.

With the Government's engagement on new towns developing further, alongside an emerging reorganisation of local councils outside London, we extend this recommendation to the GLA to consider proactively engaging existing and new local authorities in a formal relationship on strategic planning. The new London Plan could provide effective steering on terms of engagement, policy areas in focus, and the transport corridors and areas in question. New housing delivered in transport corridors in the wider South East will, ultimately, be under the planning direction of their constituent council. But their purpose, affordability, tenure, design and location will be of strategic interest to both local councils and the GLA. With London generating 25% of the UK's Gross Domestic Product and the largest tax base of any region, enabling strategic alignment through the London Plan to deliver effective regional leadership, policy and engagement would build more capacity for economic growth in a thriving region. This approach aligns with Centre for London's continued support for a more substantial devolution settlement for London, including the transfer of powers to the Mayor of London to have greater control and ability to retain property taxes and as well as 100% retention of business rates.[iv]

Moreover, through strategic alignment on housing and planning, both the GLA and its neighbouring local authorities will be empowered to implement a much more responsive, joined-up approach to tackling key affordability challenges and supporting households facing homelessness. Centre for

London previously called for this strategic approach to homelessness prevention and support in our 2024 report on London's Social Housing Waiting Times.[v]

Centre for London recognises that the new London Plan is not a strategic document on devolution to the GLA or the capital's 33 local authorities. Future devolution to London of the scale described will require greater levels of engagement and consultation with central government, local councils and residents, as explained in our 2024 paper on accelerating devolution to London.[vi] However, the new London Plan can and should embed a lasting culture of cross-borough cooperation on sub-regional planning policy. The new London Plan should therefore explicitly set out the benefits and opportunities for strategic alignment, guided by existing relationships such as the sub-regional partnerships. This approach to planning through meaningful collaboration, steered proactively by the GLA, would increase housing supply, improve connectivity, boost economic growth and promote a positive vision for collaboration.

1.10 Good Growth objectives

N/A

1.11 The Key Diagram

N/A

2 Increasing London's housing supply

The Government's updated housing targets for London are ambitious and challenging. To achieve a housebuilding rate of double its current total, including a rapid increase in the funding and completion of affordable homes, will require planning reforms which smooth the process of planning and delivery while addressing complex housing needs and diverse stakeholder priorities. London's housing crisis is, in itself, a major blocker to economic growth as consistently low levels of new supply, high land values, and a shortage of viable land has led to historic price rises. Centre for London has long campaigned for housing equality, increased supply and a recognition of London's unique housing market in national policy. We welcome the ambitious housing targets and the new London Plan's recognition of the challenges of increasing supply. However, we also have recommendations on how this supply mission should be approached, as we will set out in later paragraph responses.

2.1 A brownfield first approach

The overwhelming majority of land for development in London is brownfield with around 99% of housing delivered since 2017-18 located on previously developed land.[vii] Therefore, policies which smooth the planning process for developers looking to build homes on brownfield sites are vital. London needs to be an attractive market for new housing development, and as such, the new

London Plan must frame brownfield sites as both desirable opportunities and lucrative investments. Planning policy can be fundamental in how developers scope new sites for investment and housing delivery. Centre for London has long called for reforms to how both national policy and the London Plan approaches the market viability and opportunity of brownfield land.

As detailed in our response to the National Planning Policy Framework (NPPF) in September 2024[viii], we recommend that planning policy for development on brownfield land should be strengthened by enabling greater fast track opportunities, particularly in areas with existing adequate levels of transport infrastructure. We also have welcomed the Government's policy proposals for brownfield passports which have the potential to smooth the planning process and reduce unnecessary costs of development.[ix]

The new London Plan must recognise the challenges for developers in tackling initial, low viability from existing plots. If the government will not directly finance demolition and decontamination, planning policy must encourage developers as much as possible to bid for and build on brownfield land. This can be achieved through the Government's planning passports policy, or through improving engagement between developers and local authorities to enable greater opportunities for partnerships.

Secondly, Centre for London has proudly supported and advocated for the Government's policy changes to the NPPF enabling the development of low quality sites on the Green Belt, otherwise known as 'grey belt' land. We argue this approach to previously developed land should be integrated into the new London Plan, focusing on developing areas with high levels of connectivity to public transport infrastructure, with new development focused around connected transport hubs.[x]

Thirdly, Centre for London recommends that the new London Plan should ensure site allocations are identified and developed to maximise long-term value and to deliver a lasting, positive impact on the local area. This should include an active presumption in favour of planning permission for sites which are being developed under joint-venture arrangements or development partnerships between public and private sector organisations, as well as plans with clear provision of public and social infrastructure.

Finally, and crucially when considering brownfield sites, the new London Plan should make clear that new developments must have high levels of connectivity to public transport networks and active travel infrastructure. Given the vast majority of Green Belt and Metropolitan Open Land is likely to be found in Outer London, there is a risk that newly unlocked sites will be car dependent. As recommended in our Homes Fit for Londoners report from 2023,[xi] the new London Plan should be informed by an expert commission, established by the Mayor, to recommend 10 sites for mixed-use development at scale near rail stations as transport hubs. These should be governed by development corporations to enable access to public investment, long-term funding settlements, and low-cost infrastructure loans from the Public Works Loan Board.

2.2 London's call for sites - LAND4LDN

N/A

2.3 Opportunity Areas

The Mayor's planning designation of Opportunity Areas (OAs) has enabled locations outside Central London to become the focus of regeneration, unlocking investment, jobs and economic growth for London and the wider UK economy. OAs such as the Olympic Park, the Greenwich Peninsula, King's Cross, and Wembley have become case studies in delivering effective regeneration schemes and OA status has underpinned their success.

To this end, it is disappointing that Towards a London Plan has suggested the removal of OA status for several locations in Outer London which have significant potential for growth, both in number of homes delivered and economic output. This is particularly striking for South London. The latest strategic vision from South London Partnership illustrates the significant potential in further developing the sub-region, with a GVA of £38bn, 55,000 businesses, and six leading universities.[xii] It is understandable that the uncertainty of investment for Crossrail 2 necessitates a shift in approach to planning, including the protection of land along the suggested route from its 2015 consultation.[xiii] But removing OA status from Kingston, Sutton, Wimbledon, Clapham Junction, Bromley, Romford and New Southgate is counterintuitive to the new London Plan's other suggested policies on broadening economic growth.[xiv] As town centre destinations, removing OA status could reduce their strategic protection as investment destinations while withdrawing support for increased levels of housing delivery in areas with existing transport infrastructure. Removing OA status also threatens the loss of strategic direction on supporting innovation industries and clusters with the South London sub-region home to high growth sectors such as health and life sciences, net zero industry, and creative & digital, which collectively employs around 163,000 skilled workers and is forecast to grow by 38,000 more by 2030.[xv]

Furthermore, while Centre for London is broadly supportive of the economic policies in Towards a London Plan, there is a risk that supporting greater flexibility of building use classes to support economic growth, particularly for cluster development, undermines the definition of an Opportunity Area in providing planning protections. More planning flexibility in recognising the range of different clusters and economic centres in London is a positive approach and could generate significant levels of investment. However, this risks undermining the planning protections granted to OAs and could detract from their competitiveness, particularly for attracting innovation industries to well-connected districts, or areas with potential for densification. For the OAs stated, there is a risk that removing OA status would also undermine ongoing area-specific developments such as the transformation of Wimbledon Park and the All

England Tennis and Croquet Club site in Wimbledon[xvi], Kingston Riverside and town centre regeneration[xvii], the Clapham Junction Masterplan[xviii], and the ongoing Sutton Town Centre regeneration.[xix]

For economic centres in Outer London, including those proposed for review in Towards a London Plan, strategic planning is an essential tool for providing the protections needed to spur growth outside Central London. As detailed in our report on West London's Growth Potential[xx], planning protections have enabled the development of an emerging cluster of high-tech growth sectors at Old Oak, Park Royal, and along the WestTech Corridor. This has been boosted by transport connections and essential collaboration between public and private sectors, and shaped by a vision-led development corporation. The current London Plan Policy SD1 provides substantial benefits for local development and regeneration, using the strength of collaboration between the Mayor, local authority, developer and local community. Removing this support for suggested areas, even with their boundaries unconfirmed, both for developers and boroughs, represents a loss of strategic direction which should be maintained and nurtured if public investment in transport infrastructure is not considered likely in the medium term.

2.4 Central Activities Zone

Development in the Central Activities Zone (CAZ) supports 300,000 residents within the boundaries of an economic powerhouse. Centre for London recognises that the CAZ's constituent boroughs are under substantial pressure to deliver an increased target of new homes, as per the Government's NPPF update, while also facilitating economic development in a global city. To rebalance this need, the Mayor of London should carefully consider how to apply the Government's targets of 88,000 homes a year. To develop these homes, whether in Central London or Outer London boroughs, it remains Centre for London's recommendation to enable the rapid delivery of homes through development corporations in ten priority areas connected by transport hubs.[xxi] This approach could ensure that housing targets are met, remove adverse pressure on Central London boroughs, and establish a funded and resourced pipeline of new homes outside the CAZ.

It is likely that the future development of the CAZ for residential uses will include a higher quantity of single tenure developments such as Build to Rent, co-living, or purpose-built student accommodation due to their reliance on the economic functions and connectivity of the CAZ. As detailed in our response to the Government's consultation on the NPPF[xxii], there is evidence to suggest that mixed tenure housing developments are more likely to be successful in supporting diverse communities and inclusive growth. As such, we strongly recommend that any new housing in the CAZ should be delivered as mixed-use, mixed tenure, reflective of affordable housing requirements, and integrated into the wider urban mix. Our response to the Towards a London Plan sections on economic policy for the CAZ is detailed in later sections.

2.5 Town centres and high streets

Proposals in Towards a London Plan to introduce greater flexibility for increasing density in town centres is a positive reflection of the need to increase housing supply in London's town centres. In our Homes Fit for Londoners report, we recommend that the Mayor should re-introduce minimum densities to the London Plan for strategic areas.[xxiii] This approach would deliver a greater quantity of homes in Opportunity Areas, but also in town centres with a high level of transport connectivity. The proposed Green Belt review will also enable the unlocking of viable land for residential development, but as with previous sections, Centre for London recommends the Mayor establish new development corporations as delivery bodies where there is greater potential for rapid housing supply and as connected by existing transport infrastructure.

Supporting the supply of new homes is the London Plan's primary purpose, whether through new builds, conversions or changes of use. Indeed, the conversion of commercial premises to residential use through permitted development rights delivered over 42,000 homes between 2012-22.[xxiv] Greater flexibility for housing development through permitted development rights was implemented in the March 2024 NPPF update and remains a viable, valid method for unlocking housing supply. However, in the context of town centres and high streets, removing commercial properties from the planning map reduces town centre competitiveness and potential for economic growth. An inquiry by the Housing, Communities and Local Government Select Committee in 2021 also found that some homes delivered through permitted development rights are 'poor quality' with a lack of amenities and not converted to the same building standards as new builds.[xxv] In West London's Growth Potential, we recommended that the permitted development rights regime should be reviewed to ensure that London's local employment space is not lost to other uses, including residential.[xxvi] We maintain that this should be the case but that the flexibility for densities and newly unlocked land proposed in Towards a London Plan provides a greater spatial opportunity for housing beyond removing commercial space.

2.6 Industrial land

Brownfield sites provide ample opportunity for new housing developments but converting previously developed industrial land to renewed residential uses is challenging, not least for improving its connectivity and tackling contamination. In West London's Growth Potential, we recommend the next London Plan should continue the existing commitment of no net loss of Strategic Industrial Land or Locally Significant Industrial Land from the planning map.[xxvii] This, therefore, represents a blocker for the delivery of new homes which could be built on industrial land. In any case, residential development on industrial land should be delivered in parallel with the expansion of SIL/LSIL elsewhere to counteract any loss. While the proposals in Towards a London Plan will increase the flexibility for new industrial land to be created, including through new use classes, this should not mean that strategic planning protections for existing SIL/LSIL be lost.

2.7 Wider urban and suburban London

The Towards a London Plan vision makes it clear that London will need to densify in order to meet

its housing targets. This will require suburban London to grow upwards and outwards. In our response to the Government's consultation on the NPPF, we point to the 2022 small sites densification plans implemented by Croydon Council which delivered 2,000 new homes on small sites in three years as a result of greater flexibility for density and strategic planning support by the local authority.[xxviii] Architect Russell Curtis has estimated that the same planning arrangements, if replicated across Outer London, could see the delivery of 25,000 homes.[xxix]

As found in Centre for London's What London Thinks partnership with Savanta from November 2024, a majority (56% to 14%) of Outer Londoners are in favour of new residential-led new towns on undeveloped land in and around London.[xxx] As with previous responses, Centre for London recommends that the Mayor should reintroduce minimum densities to the London Plan, including for suburban Outer London, which reflect their spatial access to transport infrastructure. For many Outer London boroughs, densification will not be viable due to poor access to transport infrastructure. But where the planning map reflects increased diversity of use classes, higher population or public service uses, the London Plan should include planning policy which enables residential development to densify. This could be identified and shaped by the existing town centre classification or for the next London Plan to add a secondary use class framework for 'extensions' of town centres with less commercial land use and greater viability for housing development.

2.8 Other sources of housing supply

Centre for London has long called for the capital's Green Belt land to be reviewed to enable greater levels of housing supply. We also agree that any land which is assessed to be released from Green Belt classification should have strict planning guidelines to ensure new development is sustainable, connected through transport infrastructure, walkable and provides a high percentage of affordable housing. If newly unlocked land is located across two or more local authority boundaries, we recommend that the new London Plan provide clear guidance on cooperation at the least, or in strategic locations, through the creation of a development corporation.

The London Plan should be ambitious in its intention to support the city's growth and development. As part of our continued advocacy for improving London's devolution deal, Centre for London strongly believes that the London Plan should embed progressive policies which enable the Mayor, GLA and boroughs to deliver more homes through effective governance. As a source of housing, the Mayor has called on the Government to grant powers for local councils to charge higher council tax on empty properties, acquire derelict or long-empty homes, and to tackle rogue landlords. There is an opportunity to use the next London Plan to define a bespoke, strategic approach to the use of compulsory purchase orders (CPOs) for development by local authorities or the wider market. Informed by the Government's reforms granting local authorities greater flexibility to issue CPOs for land acquisition, the next London Plan should define how CPOs and Empty Dwelling Management Orders (EDMOs) can be utilised to increase housing supply and tackle under-use of dwellings, particularly in Inner London.

Furthermore, there is an opportunity to use this approach to develop a strategic policy supporting

the acquisition of homes in the private rented sector from rogue landlords. Currently, local authorities are empowered by Section 102 of Housing Act 2004[xxxi] to acquire management of rented properties to enforce licensing decisions and tackle quality issues and treatment of tenants. This was utilised by Merton Council in August 2024 but remains an underused legal tool.[xxxii] Subject to approval from the Secretary of State, local authorities also have powers to acquire existing properties to develop housing through Section 17 of Housing Act 1985.[xxxiii] There is additional legal precedent in Section 226 of Town and Country Planning Act 1990 for acquisition of properties to deliver wider planning policies and community strategies such as regeneration. This legal precedent was utilised by Haringey Council to compulsorily purchase an empty property in Tottenham to deliver improvements at High Road West.[xxxiv] The London Plan should seize on legal precedent to support a more strategic approach to compulsory purchase of empty, underused, derelict homes and private rented sector homes which have not been licensed. This guidance should also provide a strategic approach to how CPOs should be enforced, and how its acquired properties and land are used, to deliver regeneration schemes and new, large-scale developments on Green Belt land.

2.9 Beyond London's existing urban area

Centre for London welcomes the approach in Towards a London Plan on its process for identifying Grey Belt land. As in our Homes Fit for Londoners report, we recognise that the Green Belt has significant value for development, but also acts to preserve the natural environment or local character.[xxxv] Therefore, any Green Belt land which is unlocked for non-residential uses should have strict planning requirements to provide public infrastructure or a high percentage of affordable housing. This could include financial contributions or partnerships towards delivery of local transport infrastructure, such as renovation of bus and rail stations, or delivery of a district-level active travel scheme. This should be explored through reviewing borough approaches to Section 106 financial investments or payments made through Community Infrastructure Levy. In our Rebooting London's Economy report from 2023, we repeat our recommendation that large developments built on land released from the Green Belt should be built around transport hubs to maximise their connectivity and economic development.[xxxvi] Regardless of how this agreed, any commercial use on land unlocked from the Green Belt should require clear environmental offsets to ensure sustainable development and long-term stewardship of the local area. This is in line with Centre for London's submission to the NPPF update in November 2024, where we recommend for the GLA and Government to retain green spaces around and within developed sites.[xxxvii]

2.10 Large-scale urban extensions in the green belt

As with previous responses, Centre for London recommends that new residential-led urban extensions in the Green Belt be delivered through a development corporation. This will enable a more rapid supply of homes, delivered through a governance structure supported by local boroughs, the GLA, and industry experts. This approach may also unlock strategic finance to support transport infrastructure investment, and as such, improving viability of local development. This approach should also be the case for development corporations which cross local authority boundaries, including those across the Greater London borders.

2.11 Metropolitan Open Land

It is reasonable for the GLA to review the current planning map for Metropolitan Open Land (MOL) in the capital, which comprises around 10% of London's total land area.[xxxviii] Centre for London welcomes the approach suggested, which would unlock hectares of land which are not publicly accessible or are not for their intended use as amenity or community space. Redesignating these sites should be carried out cautiously and in close collaboration with local authorities as the asset's economic or community value may not be clearly defined at a strategic level. This is the case for MOL sites such as golf courses, public commons, waterside green space, or private club land. In some boroughs, such as Bromley, Havering and Hillingdon, the vast majority of 'open land' is designated as Metropolitan Green Belt, and as such would require a different approach to land assembly. The distribution of MOL in London is uneven and may not represent a substantial quantum of land which is viable for development. Therefore, MOL land which is unlocked through this route should be subject to the same planning regulations as Green Belt land which is unlocked through the Green Belt review.

2.12 Affordable housing

London is the centre of the UK's housing crisis. Through a combination of low supply rates, unaffordability for renters and home ownership, an unequal private rented sector (PRS), and the social housing sector facing delivery challenges, London needs a radical solution to solve years of housing inequality. The current London Plan's approach to the provision of affordable housing is hamstrung by a lack of public investment, despite recent top-ups to the Affordable Homes Programme. Equally, the rate of bidding for affordable housing through Section 106 in newly delivered developments has fallen dramatically with more than half of housing associations declaring a diminished interest in acquiring Section 106 homes.[xxxix]

Centre for London joined with the G15, London Councils and the GLA in its shared demands of government ahead of the Spending Review 2025, calling for registered providers to be given the stability they need to deliver on the Government's ambitions for social housing, including building new stock and acquiring Section 106 homes. It is encouraging that the Spending Review laid the foundations for registered providers to do this through a long-term above inflation rent settlement and the reintroduction of rent convergence.

As highlighted in our Homes Fit for Londoners report, long-term funding and resourcing for local planning departments, including at the GLA, is essential to be able to spur the rate of growth in affordable housing delivery required.[xl] While the Mayor and GLA are less able to directly influence the conditions of funding through the Affordable Homes Programme, the Government's Spending Review enables the potential for a long-term delivery of social homes in London. Centre for London has previously called on the Government to increase the AHP to at least £15.1bn a year nationally, funding the Mayor to unlock delivery of 30,000 social homes in London every year.[xli] Centre for London also reindorses its recommendation, as found in our London's Social Housing Waiting Times report from October 2024[xlii], for the Mayor to advocate strongly for the end to Right to Buy to minimise the continued risk of losing further council homes in the capital. It is positive

that the Mayor continues to fund the expansion of London's council housing stock through City Hall funds, and we welcome the funding unlocked through the Spending Review for a City Hall development fund which could unlock capital for new investment in affordable housing. However, there is more that can be achieved through the planning system to make the delivery of affordable homes more viable and less reliant on national grant funding to go forward, which we detail in the section below.

2.13 Planning for affordable housing

It is positive that Towards a London Plan recognises the challenging environment for the supply of market and affordable homes, as well as the role of affordable homes in fulfilling the Government's target of 88,000 homes a year. There is a clear balance needed in the next London Plan to provide incentives for developers to deliver affordable units without reducing the overall quantum as a result of changing the delivery threshold. Centre for London welcomes the proposed review of the threshold approach and recommends that this review make clear considerations of the need to boost housing supply at pace and ensure registered providers are financially able to bid for Section 106 homes, while improving viability for developers.

The proposal for a more flexible approach to applying thresholds in different land use classes is a positive step towards improving supply, particularly in boosting housing delivery on small sites. This in turn may also reduce the level of delay in the planning system and contribute to a smoother process. However, as stated in our Homes Fit for Londoners report, the challenge for accelerating the rate of delivery for affordable homes is significant, especially without a groundswell of public-private investment into the social housing system.[xliii] While improving economic conditions may result in a more balanced budget, changes to delivery thresholds are unlikely to substantially improve the current system for supply of affordable housing. As above, Centre for London also welcomes the approach to requiring a 50% affordable housing threshold on newly unlocked Green Belt and Metropolitan Open Land as standard.

In addition, the proposed focus on maximising the delivery of social rent homes is welcomed but will ultimately require a greater amount of subsidy than intermediate rental tenures to complete and may result in a reduced overall total. As found in our London's Social Housing Waiting Times report, there is an urgent need for increased supply of social homes to reduce waiting times, particularly for Inner London boroughs.[xliv] We also recognise the intention of introducing a new intermediate rent tenure for key workers, as per the Mayor's 2024 election manifesto. To maximise its impact, we recommend that the new London Plan encourages that a greater proportion of Key Worker Living Rent homes are delivered in Inner London to improve the affordability of homes for key workers in areas with especially high housing costs. As recommended in our Homes Fit for Londoners report, this flexibility should ideally be explored at a national level through an Affordable Housing Commission which sets grant levels and assesses intermediate rental tenures based on expert projections.[xlv] Centre for London continues to strongly advocate for the delivery of affordable housing at scale and pace, but in the context of London's existing devolution deal, there are few ways beyond the planning system to incentivise affordable housing supply. We have advocated for the devolution of property taxes such as stamp duty, as well as a new proportional property tax to replace council tax, to improve equity and

increase affordability.[xlvi]

2.14 Estate regeneration

Centre for London welcomes the proposed approach for estate regeneration schemes. Introducing new guidance to ensure a full replacement of social homes as part of new developments is both fair to existing residents and may increase overall viability for developers in delivering additional affordable housing. As in current guidance, estate regeneration schemes must be carried out sensitively and with the views of residents considered at all stages of redevelopment. Towards a London Plan's proposal for a more flexible approach to density in the planning system should also apply to estate regeneration schemes where viable, with guidance introduced to maximise the use of estate land for housing supply, amenities and community uses. This approach to densification should also run in parallel with increased building density in adjacent sites, adopting a mixture of block types and building heights to reduce the impact of massing.

2.15 Build to rent

The Build to Rent market (BTR) represents an opportunity for London's PRS to evolve and improve standards. Institutional landlords are more likely to be backed by private capital investment and reflect a demand for high-quality rented homes for middle income Londoners. As such, reviewing the current approach to BTR to expand its definition could generate additional supply and alleviate pressure on the conventional PRS and other intermediate tenure options. Centre for London maintains that while BTR is a potential route for investment, the conventional PRS is one of London's continued challenges for housing equity, affordability and the wellbeing of Londoners. It is therefore disappointing that Beyond a London Plan does not include any proposals or measures to improve the quality, standards or supply of the capital's PRS, which houses close to three million renters. There is an opportunity to use the London Plan to accelerate the rate of improvements in the capital's PRS through developing supplementary guidance on the quality of new and existing rented properties. This guidance could then support local authorities in their role as licensing authorities, guided by the Mayor's statutory consultation role on pan-London PRS licensing.

It is encouraging that the Mayor continues to make a strong case for additional responsibilities for rent control to government, as well as working with local authorities to develop a pan-London selective licensing scheme. Centre for London has supported this approach and as stated in our Licence to Let report from 2023, there is an opportunity to introduce London-wide licensing schemes for improving the PRS in the context of the upcoming Renters Rights Bill.[xlvii] The next London Plan should build on this to encourage boroughs to take a 'positive approach' to regulation and investment in BTR homes in their boundaries. This should be further enhanced utilising the Mayor's statutory role in consultations on selective licensing to support a joined-up strategy for regulating London's PRS, providing an opportunity to foster partnerships, improve standards and attract capital investment in the BTR sector. This builds on the Mayor's Landlord Licensing Hub as both a resource for the public and private sector.

2.16 Other housing options

N/A

2.17 Specialist and supported housing and housing London's older population

The current approach to delivering supported housing for older Londoners enables boroughs to take a more specific review of housing needs in their area. This is flexible and informed by local decision-makers and communities. However, as our Third Age City report from 2021 found, the increasingly unaffordable housing market for older Londoners and lack of choice for care-supported homes requires a more strategic approach to providing a good standard of housing.[xlviii] In the report, we recommended that the Mayor establish an older people's specialist housing target for large sites, starting at 5% of total completions and subject to the same affordability requirements as the wider development. This should be implemented in parallel with borough Local Plans specifying the quantum of older person's housing it will build per annum, as guided by the London Plan's benchmark. This approach remains Centre for London's recommendation and should be considered for the next London Plan.

2.18 Purpose-built student accommodation and other forms of shared housing

The provision of single tenure purpose-built student accommodation (PBSA) is a valid form of investment in London's housing system and provides vital housing for the hundreds of thousands of students who attend the capital's universities and colleges. PBSA is also effective at reducing pressure on London's PRS and HMO sector. However, in some areas of London where campuses are more disconnected from town centres, the delivery of PBSA risks using valuable brownfield land which may have broader uses for other housing tenures. Therefore, the next London Plan will require an effective balance. Centre for London recommends that PBSA remain a competitive and viable form of investment in the housing system, with new developments located around major infrastructure routes, interchanges or connections. These developments will benefit from the proposed flexibility for densities and should continue to provide offsetting through the Section 106 system to ensure community infrastructure or additional supply of affordable housing is delivered. On the planning and development for Houses in Multiple Occupation (HMOs), Centre for London restates its recommendation for the Mayor to take a more active, strategic involvement in the city's licensing schemes for HMOs to drive up standards.[xlix]

2.19 Gypsies, Travellers and Travelling Showpeople

N/A

3 Growing London's economy

Reform of the planning system is essential for improving London's economy and building the productive, sustainable and high growth industries which the capital needs. As detailed in our Rebooting London's Economy report from 2024, the London Plan has a key part to play in defining the future of London's business needs and reflecting the trends of high growth sectors.[l] It is therefore positive that the Towards a London Plan vision recognises the opportunity presented by the new Class E building use class, which has the potential to maintain and develop premises for business uses without requiring planning permission. Our 2022 report Remixing Central London recommended that the next London Plan should introduce more flexibility into the planning map for commercial premises, particularly for ensuring a steady growth in footfall for hospitality, leisure and cultural businesses.[li]

Overall, the vision presented by Towards a London Plan presents several positive amendments to planning policy which, if implemented, could boost polycentric economic growth across the capital region and wider South East. Through revisions to strategic protections for industrial land, tall building cluster definitions, and a more flexible approach to use classes in town centres, the next London Plan is seeking to clearly reflect the Government's growth agenda. However, as recommended in our report on West London's Growth Potential[lii], there is an opportunity to boost growth through planning policy by introducing a new 'spatial jobs target' which quantifies and sets a borough-level target for the number of potential jobs which could be created through new development.[liii]

3.1 The Central Activities Zone

While amounting to just 2.2% of the capital region's total land area, the Central Activities Zone (CAZ) is home to 41% of London's jobs, while hosting a third of London's total commercial floorspace.[liv] As a result of agglomeration in high growth services specialisation and internationalisation, the development of the CAZ has boosted London's economic output while the competitiveness of other London sub-regions has arguably fallen. As explained in our West London's Growth Potential report, the continued focus of high-growth specialised services in Central London has played a role in rising income inequality over recent decades while, more recently, productivity has plateaued.[lv] To this end, Centre for London endorses planning policy which ensures the CAZ remains competitive at a global and national level, recognises the need for a mixed-use, diverse and dynamic Central London, while making certain that growth opportunities outside the CAZ are identified and developed to the same vision of prosperity which the CAZ has enjoyed.

Proposals in Towards a London Plan to review the CAZ boundaries and its mixture of commercial uses is a positive approach which could identify hyperlocal areas with significant potential for densification. There are also significant opportunities to utilise the multi-partner regeneration schemes at Euston[lvi], Waterloo[lvii] and Liverpool Street[lviii] stations to integrate new commercial developments into an existing transport interchange. While the CAZ planning map in itself reflects a much smaller part of the wider city region, there is an opportunity to reflect on existing and

successful 'masterplan' redevelopments for inspiration into how the CAZ boundaries could be reviewed. Examples include the regeneration of King's Cross[lix], Canada Water[lx] and Paddington.[lxi]

Furthermore, the proposal to strengthen the London Plan's protections for cultural and night-time economic uses through reforms to the 'agent of change' in principle would provide greater certainty of value and operations for nighttime venues. This approach would also align with the proposed flexibilities for densities, particularly in town centres. However, this reform should ensure that the wellbeing of local residents remains a guiding principle, especially for the development of mixed-use districts. As recommended in our Remixing Central London report[lxii], the delivery and demand of public services in the CAZ is not easy to predict and therefore the review of the CAZ boundaries should be carried out sensitively to ensure planning policy and subsequent designation does not restrict communities' access to public infrastructure such as education and health services. Additionally, to ensure these reforms to the 'agent of change' principle are sensitively implemented, the new London Plan should ensure local authorities are adequately resourced for licensing enforcement before seeking to create a more 'high-density agent of change' principle.

While the proposed approach to the CAZ would improve London's competitiveness as a global destination, planning policy requires greater integration with the licensing system to truly transform the long-term direction of CAZ development. Currently, the GLA has little influence over licensing policy at a borough level, despite having concurrent responsibility for major commercial planning applications. There is potential, especially in an area as densely populated with licensable commercial developments, for a more strategic approach to licensing which enables the GLA to support good growth in the CAZ.

3.2 Specialist clusters of economic activity

Centre for London has long advocated for greater strategic protections to employment land uses with high potential for growth, particularly when tied to sectoral strengths or local economic development. Most recently, this advocacy focused on protecting strategic industrial land in West London.[lxiii] A brief look at London's industrial history highlights how businesses cluster naturally to support production. Therefore, the proposed changes in Towards a London Plan to enable a more flexible approach to cluster development could lead to significant boosts to growth sectors. Flexibility in how clusters are identified, their strategic land protections, and associated standards for new buildings and infrastructure could be transformative for London's industrial future.

Greater flexibility for commercial development makes cluster development more viable but puts greater responsibility on the market to agglomerate and grow. Over recent decades, London's major clusters of economic activity have required additional governance, infrastructure or strategic planning to spur investment. Examples of this include King's Cross[lxiv], Docklands[lxv], and Stratford[lxvi]. Identifying sites for growth industries requires intense cooperation with the private sector and boroughs. But more than just identification, it requires strategic support through the planning or governance system and essential transport infrastructure.

The vision for more flexible approaches to cluster development, densification and town centre diversity will require much greater engagement between the GLA, boroughs and businesses to identify areas which require additional governance to support regeneration or to spur investment. While the growth-centred approach is positive, the London Plan is a strategic, city-wide vision which can command where and how commercial and residential development is targeted. Without direction from strategic planning or governance, investment will 'follow the money' and avoid areas which perhaps lack a clear growth narrative. This is especially the case for Outer London boroughs where transport infrastructure is less developed or diverse.

The proposal for greater flexibility could also be impactful for local industrial niches like digital in East London Tech City[lxvii], antiques & heritage on Portobello Road[lxviii], screen industries in Acton[lxix], aviation in the Cray Valley[lxx], or healthcare in Sutton[lxxi], as it would allow local authorities to represent their borough's strengths in planning guidance while reflecting the ambitions of emerging sectors. Centre for London welcomes the proposed flexibilities for cluster development planning in Towards a London Plan, but notes that designating an area as a 'cluster' in a city as dense and mixed as London is complex and will require extensive engagement with local stakeholders.

As seen with the Old Oak and Park Royal Development Corporation (OPDC), while the majority of land is allocated for industrial and employment uses, existing and new housing and public infrastructure is integrated into the urban mix. This has benefits for residents and employers but can produce challenges in developing conflicting building use classes and infrastructure. Therefore, the balance between fervour for growth sector development and meeting housing targets needs to be well planned and carefully considered to ensure there is no conflict between the two, especially for developing B3-B7 buildings.

3.3 Town centres and high streets

The proposed review of town centre designations and shift in policy towards a more flexible approach to commercial development in local town centres and high streets is positive in supporting economic growth outside the CAZ. In effect, this promotes a greater variety of town centre destinations and economic centres across the capital, which is conducive to the development of a more functionally polycentric urban economy. This can be supported further through enabling the Class E building use class in the London Plan to allow more flexible conversion of commercial premises. The proposals in Towards a London Plan should enable boroughs to attract more investment for higher density office and commercial developments in town centres, broadening the economic potential of London. This approach, alongside flexibilities for cluster development and land use designation, could also build on the success of infrastructure projects such as the Elizabeth line and Northern line extension to Battersea Power Station, to attract commercial development in centres with high footfall.

In West London's Growth Potential, Centre for London advocated for the adoption of a functionally polycentric model of economic growth in the capital which supports substantial and interdependent economies which complement each other in a diverse, connected regional

economy.[lxxii] While the proposals for reviewing town centre land use designation are positive, for these centres to grow more inclusively, the London Plan needs to be supported by investment in orbital transport infrastructure to allow for improved connectivity. The support for projects such as the West London Orbital, Bakerloo line extension, and DLR extension to Thamesmead is therefore essential for unlocking orbital connectivity and new land for development.

3.4 Industrial land

As found by Centre for London's convened Industrial Land Commission in 2022, London has experienced a significant loss of industrial land equivalent to 840 football pitches (6 million m^2), with 40% of this lost space converted for other uses.[lxxiii] Inner London has been especially affected by the conversion of industrial land into residential and other commercial uses. As highlighted in West London's Growth Potential, the loss of industrial land risks reducing the value of competitive sub-regional growth industries, while reducing employment uses in both foundational and growth sectors.[lxxiv] Therefore, implementing a more flexible approach to industrial designation, but maintaining the same key land and planning protections, would benefit economic development and arrest the loss of strategic and locally significant industrial land to other uses. The proposal to set strategic levels of industrial land and their priority uses would also enable the London Plan to have greater regulatory influence on the development of new clusters.

On transferring responsibilities for managing industrial use class development to local authorities, Centre for London recommends that industrial building use class land is retained at a strategic, city-wide level. Removing this strategic approach would influence the viability of investment in growth sectors in newly created clusters and may represent a loss of strategic direction for innovation in the capital, particularly for increasing high-class industrial footprint in boroughs such as Ealing, Hillingdon and Bexley. Retaining industrial land as strategic land would also allow for brownfield sites within industrial districts like the OPDC to remain employment-focused without the risk of boroughs removing industrial land from the planning map.

3.5 London's night-time economy

London's night-time economy is iconic, culturally important and central to the capital's appeal as a global city. Its generation of £46bn annually for the UK economy makes London's nightlife a national asset. However, the loss of 3,000 pubs since the Covid-19 pandemic, continued challenges in operating costs, and a fall in consumer demand, has shaken London's confidence as a nightlife destination.[lxxv] In our Remixing Central London report, published in the wake of the pandemic, Centre for London recommended that greater flexibilities for building use classes and commercial protection from permitted development rights were essential to ensure the CAZ remains sustainable and economically viable.[lxxvi] This approach can also be applied to wider night-time commercial uses to ensure that planning policy protects premises from conversion into other uses. As such, we welcome the proposal in Towards a London Plan to identify clusters of specific night-time activity which may benefit from additional protections, including to ensure the ability for empty commercial properties to be utilised for meanwhile use functions.

3.6 Culture and creative industries

Arts, culture and the wider creative industries are one of London's most significant exports, contributing 12.9% of London's economic output in 2019. The sector also contributes to London's soft power as global destination. As found in our 2025 report Arts for All, the rate of cultural participation in London varies and is limited by functional and socio-economic barriers.[lxxvii] Indeed, 30% of Londoners rated removing physical barriers such as price, location and convenience as the most important aspect for improving cultural participation. While the planning system is less able to influence consumer effects, policy can reduce the barriers for cultural and creative industries to be successful. The proposal in Towards a London Plan for reviewing the 'agent of change' principle in dense commercial clusters would address functional challenges for noise reduction, and ultimately, improve viability of operators. Centre for London also welcomes the proposed approach for reviewing the London Plan policy on cluster development to identify new opportunities for Creative Enterprise Zones.

3.7 Visitor economy

The current London Plan's restrictions on delivering new purpose-built visitor accommodation such as hotels, bed & breakfasts and boarding houses will require a review to match with the proposed changes to CAZ boundaries and/or high-density commercial clusters in Central London. Research from Knight Frank forecasts a mixed picture for London's hotels market, largely due to the impact of the Government's increase to minimum wage and employer National Insurance contributions.[lxxviii] Nonetheless, the long-term potential for growth in the visitor economy from infrastructure projects such as the Oxford Street pedestrianisation[lxxix], airport expansion, and diversification of services on HS1 at St Pancras International[lxxx] will require additional accommodation space to support more tourists in Central London.

As with previous responses, Centre for London recommends that the identification of clusters and sites for new visitor accommodation be carried out with a clear balance against the needs of residents. As per our Remixing Central London report, there are also opportunities for introducing diverse commercial uses integrated into larger developments.[lxxxi] The next London Plan should explore how policy can encourage visitor accommodation to integrate other public service uses such as health centres, community spaces, or low-cost retail and hospitality units to promote a more vibrant offer. The introduction of Class E building use class for commercial property enables this conversion and unlocks new opportunities for mixed-use development.

3.8 Digital infrastructure

N/A

3.9 Access to employment

N/A

3.10 Affordable workspace

The provision of low-cost commercial workspace is essential for small to medium-sized businesses to start up, scale up, and co-create products which make our economy more innovative and competitive. In our West London's Growth Potential report, we highlight the benefits of providing affordable workspace with the West London sub-region's business population growing by 171% between 2010 and 2024, compared to 50% in Central London for the same period.[lxxxii] This has been driven by a greater number of SMEs utilising the sub-region's industrial spaces which are both more flexible and affordable compared to Inner London spaces. This has been developed further by Imperial College London whose WestTech Corridor innovation ecosystem will actively invest in low-cost, dedicated spaces for incubation, start-ups and scale-ups.[lxxxiii] The scale of the affordability challenge is also explored in Centre for London's report from the Industrial Land Commission[lxxxiv], which found that new industrial floorspace built to high energy efficiency and carbon standards is increasingly unaffordable both for delivery and occupation, with additional planning requirements for affordable workspace borne upfront by developers.

However, there is a clear need for industrial developments to unlock more affordable workspace for start-up and scale-up businesses in key growth sectors. Centre for London restates its recommendation from the Industrial Land Commission that a new co-invested, ringfenced fund in partnership with private investors, could be deployed to mitigate costs of delivering affordable workspace in industrial developments.[lxxxv] This approach would enable industrial development to intensify more viably and introduce further opportunities for co-location.

4 London's capacity for growth and design quality

Towards a London Plan provides a clear assumption that London will be required to densify in order to complete its housing targets and boost economic growth. Therefore, designing London's built environment to be equitable, accessible and futureproofed is a priority for the wider development sector as the capital grows. In Centre for London's Healthy Placemaking Approach report on opportunities for health-led planning in London Bridge, we outline the opportunity for the built environment sector in embedding health principles into planning policy to improve local health outcomes, productivity and economic growth.[lxxxvi] Using the existing planning framework of Section 106 and Community Infrastructure Levy contributions, the London Plan can introduce a greater flexibility of guidance to improve public infrastructure and local socio-economic outcomes. There is also an opportunity to align the London Plan to the ongoing policy implementation for building safety remediation to reassess the core purpose of the built environment: delivering homes and employment spaces to high standards. Further recommendations on design and building quality are included in the below responses.

4.1 Building height and scale

As a capital city, London is significantly less dense outside its central districts. As Centre for London recommended in our response to the NPPF update in November 2024, local councils should be enabled to support densification on viable sites close to existing public infrastructure with a view for delivering more homes at scale.[lxxxvii] While the development of high-rise buildings upwards of seven storeys in height can be considered contentious, Londoners are more likely to support or be indifferent to the delivery of new homes in high-rise buildings, with 35% of Londoners more supportive of developments considered high-rise and 32% less supportive.[lxxxviii] More generally, our polling with Savanta has found that taller or more dense developments are more supported if accompanied by new services (supported by 68% of Londoners) and accompanied by new public transport routes (supported by 64% of Londoners).[lxxxix] On the consideration of a minimum height benchmark for new developments, the capital's housing need is shaping attitudes towards height and scale. Centre for London welcomes this proposed approach, maintaining that the review of Tall Buildings clusters will unlock further sites for development. This includes densification of small sites, which under the approach, would enable a greater level of housing supply.

4.2 Tall Buildings

Centre for London welcomes the proposed review of the London Plan's definition of a Tall Buildings cluster and restates its support for planning policy to encourage consideration of opportunities for densification through design codes, particularly for small sites. This is recommended in our response to the NPPF update in November 2024.[xc]

4.3 Supporting a denser London linked to transport connectivity

Centre for London has long advocated for the capital's development to be tied to the provision, enhancement and delivery of transport infrastructure. Recent successes in delivering new infrastructure have resulted in a development boom around new train stations. This has been experienced most substantially from the completion of the Elizabeth line which since 2017 has boosted the number of new homes in Abbey Wood by 6% and jobs access by 11%. Network-wide, Crossrail has boosted the supply of new homes by more than 33,000, including at least 7,000 Build to Rent homes.[xci] This evidence makes the case for London to be further enhanced by transport infrastructure to unlock new areas of regeneration and investment, while growing the economy. Centre for London has strongly endorsed the three rail infrastructure projects named in Towards a London Plan and has worked in coordination with local councils and sub-regional partnerships to advocate for investment in their delivery.

It is therefore disappointing that the opportunity for densification in major town centres across London is no longer being pursued in tandem with continued advocacy for Crossrail 2. Alongside removing Kingston, Wimbledon, Sutton and Clapham Junction from the London Plan's designation of Opportunity Areas, these are centres with significant potential to benefit from connectivity and the economic growth which connectivity would provide. It is especially important when considering the lack of Opportunity Areas and densely populated town centres in South and South West London. Centre for London will continue to advocate for a fully funded, viable investment into the

delivery of Crossrail 2, and will work with Places for London, TfL and the Mayor to advocate for this future.

4.4 London's heritage

N/A

4.5 Designing the homes we need

N/A

4.6 Heat risk, ventilation and overheating

N/A

4.7 Homes for families

Inner London boroughs have been faced with an emerging demographic challenge with declining school places, falling birth rates and an ageing population. Despite political impetus following the 2022 local elections, particularly in Tower Hamlets[xcii] and Newham[xciii], to deliver more family-sized homes, there is an opportunity to arrest the loss of 2, 3, and 4-bedroom sized stock through a strategic policy approach. Centre for London welcomes the proposals for implementing more consistent criteria for larger homes. However, planning policy will need to encourage a more substantial market shift to enable developers to build larger homes as opposed to the current standards of one or two bedroom units.

While this approach should be implemented strategically, such as setting minimum size mix standards in more densely populated areas, there will need to be a highly sophisticated, nuanced investigation into the public realm, land values, public amenities, and overall building viability to support delivering larger homes. To accomplish this, the GLA should work with housing associations, education providers, health service operators and local authorities to build a body of hyperlocal evidence showing where family sized homes are more needed. This could then be applied to the calculation of borough housing targets to create clear parameters around which housing sizes should be developed. Centre for London has also advocated for devolution of property taxes, including stamp duty, to enable the Mayor and boroughs to incentivise downsizing.[xciv]

4.8 Accessible housing

N/A

4.9 Space standards and other requirements

N/A

4.10 Designing for everyone

Centre for London has long called for London's planning authorities to ensure its infrastructure, housing and public realm is designed sensitively and for the benefit of the local community. In our 2022 report on High Streets and Placemaking in Royal Borough of Kensington and Chelsea, we set out key principles for public and private sector organisations for shaping local spaces to provide a healthy, inclusive centre.[xcv] These interventions varied from promoting local cultural participation to providing accessible walking routes and pavements. This approach was developed further in our 2025 report on Healthy Placemaking for London Bridge, which took a much more health-led approach to public realm design at a hyperlocal level.[xcvi] Through the lens of interventions which businesses can make to support healthy workplaces and local spaces, we recommended the local BID, Team London Bridge, embed a health-led impact framework to all its services to guide placemaking efforts.

We welcome the proposed approach in Towards a London Plan for meaningful engagement with groups with lived experience, either through design review panels, consultations or less prescriptive guidance on accessibility standards. This approach is likely to be more influential for planning applications with a commercial or infrastructural focus due to their greater reliance on access to the public realm for operations. In our 2021 report on improving lighting in London, we recommended the Mayor implement supplementary planning guidance on the provision of lighting in public spaces, as well as a framework for supporting local authorities in developing their own lighting strategies.[xcvii] These recommendations are especially pertinent in response to the Towards a London Plan proposals for reviewing the CAZ boundaries and 'agent of change' principles.

Overall, there is a clear need to align principles of accessibility with both health & wellbeing and economic development. As stated in our 2023 report on Reducing Street Clutter in Central London, we highlighted the importance of a decluttered street scape for improving access, street-side pollution, and economic value for local authorities and businesses.[xcviii] At a pavement level, commercial development can spill onto the public realm as a result of a lack of waste consolidation or removal services and its related infrastructure. Street clutter and poor pedestrian spaces is also a considerable problem for Londoners, with 28% dissatisfied with the quality of pavements in their local area.[xcix] As such, the next London Plan should provide comprehensive guidance on accessibility in design and operations through the whole development lifecycle, from early design review panels to maintaining inclusive spaces once completed. To ensure new commercial development is designed to promote accessibility and inclusivity, the London Plan should seek to promote its standards with broad objectives of corporate social responsibility to indicate the economic benefits of aligning with inclusive design guidance.

5 London's infrastructure, climate change and resilience

London has one of the best metropolitan transport systems in the world. The capital's infrastructure is a case study in the benefits of delivering infrastructure as a structural necessity for economic growth, housing development, and urban density. The Elizabeth line, for example, has boosted the delivery of new jobs and homes across the entire line, including a 14% increase in housing delivery between 2017-22 in East London.[c] Indeed, Centre for London's survey partnership with Savanta has consistently recorded transport as a low policy priority area for Londoners, with 65% satisfied with the quality of provision of public transport in their local area.[ci] However, there are gaps in the network which the London Plan should address including its integration of active travel methods, approach to car parking, and the delivery of major infrastructure schemes.

Similarly, the London Plan can influence demonstrable change to the built environment through climate policies and interventions. To date, the Mayor of London has delivered the majority of changes to climate policy through the transport system or in planning guidance. Londoners, however, are clearly concerned about the state of the environment, with nearly two thirds (63%) of Londoners aged 18-34 feeling personally impacted by climate change.[cii] The next London Plan should reflect the opportunity for deepening the Mayor's climate policies through active and more subtle changes to the transport system and built environment. While many of these policy areas are not a responsibility for the Mayor or TfL, there are areas where the London Plan can influence positive adaptations such as energy efficiency, biodiversity and waste. Centre for London will be exploring topics related to the environment, climate and resilience through our Decarbonising London strategic research programme, launching in 2025.

5.1 Energy efficiency standards

Developers of new housing and commercial buildings are guided by the National Planning Policy Framework and the Decent Homes Standard to deliver a high standard of energy efficiency above EPC certificate rating of C or above. Energy efficiency standards have been the victim of political change in the previous government, causing uncertainty for developers, landlords, local authorities and residents. The current Government has since reintroduced high standards for EPC ratings, especially for the PRS, which Centre for London has welcomed. Due to this uncertainty, and the clear need to have alignment with national policy, the next London Plan should ensure that its guidance on energy efficiency remains the baseline requirement of any planning application. There is scope for introducing a 'best practice' standard for housing which is more aligned to industry practices, as with the current London Plan's approach to dwelling size. Though this should be introduced sensitively and specific to building use classes with greater need for high energy performance such as data centres, hospitals and food processing centres, so not to introduce further confusion or require greater offsets.

London's housing stock has a high proportion of social and private rented sector homes which are not energy efficient. Our 2023 report Homes Fit for Londoners found that in 2023-24, 43% of London's social housing stock is below EPC certificate rating of C, and is highly susceptible to damp, mould and subsidence.[ciii] This is also the case for the private rented sector where

approximately 52% of private rented homes are energy efficient.[civ] For London's offices, as of 2022, 96% of premises have EPC certificate ratings of C or below.[cv] As such, the greatest need for policy action is to improve energy standards in London's existing building stock. In Homes Fit for Londoners, we recommend for the Government to implement a Net Zero Fund costed at £4.45bn a year to retrofit England's social housing stock, with £1.3bn a year to improve energy efficiency for all London's social homes.[cvi] We maintain that the Mayor should continue to lobby for additional funding to support retrofit, while utilising the powers for implementing a city-wide selective licensing scheme to influence the upgrading of PRS homes.

5.2 Heat networks

N/A

5.3 Whole life-cycle carbon (WLC) and Circular Economy (CE)

N/A

5.4 Waste

N/A

5.5 Green and open spaces

N/A

5.6 London's open spaces

N/A

5.7 Green infrastructure and biodiversity

N/A

5.8 Water

N/A

5.9 The strategic importance of London's waterways

N/A

5.10 Flood risk management

N/A

5.11 Water management

N/A

5.12 Transport's role in London's growth

The Mayor's progress on decarbonising the capital's transport network is commendable and has transformed the way London travels. The successful implementation of the Ultra Low Emissions Zone (ULEZ) has improved air quality and reduced carbon emissions from the removal of older, polluting vehicles from the capital's roads. In this area, Centre for London has long supported the purpose and implementation of ULEZ[cvii], but continues to endorse a further acceleration of road-user charging policy to introduce a single road user charging scheme. In our 2023 report Moving with the Times[cviii], we call on the Mayor to go further on making the economic incentives for travelling greener and fairer. It is welcome that the Towards a London Plan proposals recognise that public and active travel options are more space efficient, more affordable and less impactful for London's climate and air quality. We also welcome the recognition that minimising car use will mean less need for car user infrastructure such as car parks. However, without the incentives provided by further road-user charging policy, the next London Plan will remain strongly locked into supporting the delivery of car user infrastructure.

As previously stated, Centre for London endorses planning policy which ensures new, major developments are connected through transport infrastructure, as well as using this infrastructure as a central growth hub.[cix] In the context of the Government's Spending Review and 10-Year Infrastructure Strategy, there is an unfortunate risk that London's future development will be unsupported by government funds for major infrastructure such as the West London Orbital, DLR extension to Thamesmead, or Bakerloo line extension. Centre for London strongly supports the Mayor's continued lobbying to central government funding to support this capital investment. We also endorse further opportunities to shape this investment and improve its viability through land value capture, tax incremental financing, and public-private partnerships.

However, the next London Plan should not withdraw ambitions for new development despite this uncertainty. There is clear potential to use the London Plan as future guidance for the capital's major centres of growth and Opportunity Areas. We recommend that the next London Plan includes a broad, non-exhaustive range of transport infrastructure improvements as a list of ambitions for planning and development. Beyond those listed in Towards a London Plan's

infrastructure projects for Opportunity Areas, further projects include Crossrail 2, Heathrow rail links, Meridian line, new rail stations at Ruckholt Road, Beam Park, and Surrey Canal Road, plus upgrades to rail stations at Stratford, Euston, Waterloo, and Liverpool Street.

5.13 Sustainable transport networks to support growth

Centre for London has long supported the development and enhancement of the capital's sustainable and active transport network. As our 2023 report Moving with the Times found, there is a clear gap between the utilisation of active travel methods in Outer London compared to Inner London.[cx] This is illustrated in car use statistics with 69% of households in Outer London having access to a car, compared to 42% in Inner London. Transport for London's 2023 Travel in London Report 15 has also indicated that upwards of 494,000 daily car trips in Outer London could switch to a more sustainable method by 2026, if supported by attitudinal and infrastructural changes.[cxi] We welcome the proposals in Towards a London Plan for requiring borough Local Plans to provide clearly defined interventions for improving active travel in each borough. However, as outlined in our 2023 Moving With the Times report[cxii], we further recommend the Mayor develops an Outer London Transport Strategy reflecting travel methods, attitudes, access and improvements to support both TfL in its service delivery and the next London Plan to guide the development of new, connected sites in Outer London.

5.14 Car parking, cycle parking and deliveries

There are several policies which the next London Plan could implement to ensure new development is connected to active travel methods and infrastructure. As discussed in our Moving with the Times report[cxiii], and our 2021 Micromobility in London report[cxiv], planning policy is an effective method of providing access to active travel methods. This includes provision of cycle hangers, interior secure shelters, e-bike and e-scooter charging infrastructure, dropped kerbs and cycle gates. The provision of these should be implemented sensitively and accompanied by an Equality Impact Assessment to ensure that new micromobility infrastructure does not impact on people with protected characteristics.

This approach also applies to planning for car parking. As previously stated, Centre for London strongly endorses policy which reduces private car use and congestion. Development on underused or disused car parks is an effective use of space. However, car parking remains a preference for Londoners. According to survey data from our partnership with Savanta, support for new developments which do not contain on-site parking is split with 31% more supportive to 35% less supportive.[cxv] Outer Londoners are also significantly less supportive of parking-free development than Inner Londoners at 40% to 27% respectively. Due to the lack of viable land for development, car parks are being pursued as allocated sites in borough Local Plans including Lambeth[cxvi], Waltham Forest[cxvii], Croydon[cxviii] and Barking and Dagenham[cxix]. Therefore, we recommend that where developers are seeking to create a 'car-free' development, this must be accompanied by an Equality Impact Assessment and appropriate levels of parking for deliveries and disabled access.

As discussed in our 2022 report The Active Last Mile, for both commercial and residential developments, even if delivered as 'car-free', there should be dedicated loading and unloading spaces protected on-street.[cxx] This is especially crucial for high-rise residential developments without dedicated parking. To support a more efficient, connected and growth-driven urban environment, Centre for London recommends the development of urban logistics hubs to support local businesses and residents. This approach was outlined in Centre for London's 2023 report on urban logistics hubs.[cxxi] The next London Plan should support the development of these hubs in Inner London, through dedicated development or integration into other commercial uses. When connected to residents and businesses through cargo bikes, it also reduces carbon emissions through reducing the amount of car and van usage.

5.15 Responding to transport trends and new technologies

N/A

5.16 Fire safety

N/A

5.17 Air quality

N/A

5.18 Heat risk

N/A

5.19 Healthy communities

N/A

Endnotes

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