



THE LONDON PLAN DRAFT 2026

Centre for London Consultation Response

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Strategic Summary

The draft London Plan is more spatially confident than its predecessor, and its more growth-oriented and explicit about the need to increase housing supply, intensify well-connected land and support economic development across London. Centre for London supports this direction, including the renewed use of minimum densities, the priority given to brownfield growth, a more ambitious role for town centres and economic clusters, and the qualified release of suitable Green Belt land.

However, the Plan identifies where London should grow more convincingly than it explains how that growth will be delivered in practice. Spatial designation alone will not overcome fragmented ownership, infrastructure constraints, weak utilities capacity, development finance pressures or limited public-sector delivery capacity. The final Plan must connect its growth locations to funded infrastructure, accountable leadership, effective land assembly and enforceable cross-boundary arrangements.

The same distinction applies to housing. The proposed target of 558,451 homes may represent an assessment of deliverable capacity under current conditions, but it should not be mistaken for the level of delivery required to meet London's housing need. Viability should shape how policy is implemented, not determine the limit of London's long-term ambition. Poorly calibrated requirements can prevent schemes proceeding, while unclear or negotiable requirements create additional risk. The response should therefore be proportionate, predictable and spatially sensitive policy, supported by reforms to grant, borrowing, infrastructure funding and delivery institutions.

Centre for London also considers that the Plan relies too heavily on nominal measures of provision and does not seek to deliver a comparable quality of the spaces it replaces. Replacement housing, employment space, industrial capacity, cultural facilities and affordable workspace should be judged by functional equivalence, not floorspace alone. A space's location, lease or tenure, affordability, suitability for occupation, and the length of occupation also determine whether replacement provision serves the same households, businesses and communities.

Finally, the Plan should distinguish clearly between outcomes that can be secured through the planning process and those that require alignment with wider regulatory and funding systems. This is especially important for utilities, transport, building safety, housing subsidy, employment and skills, and the relationship between planning and licensing. The Plan cannot resolve every external constraint, but it should establish how its policies will be coordinated with the institutions responsible for delivery.

Centre for London therefore supports the draft Plan's central direction but considers it incomplete as a framework which is actively capable of enabling delivery. Its final form should combine local flexibility with clear London-wide principles, match strategic ambition with institutional and financial capacity, and measure success through completed homes, occupied premises, sustained employment and functioning places rather than permissions, allocations or nominal floorspace alone.

Recommendations for improvement

- Match strategic growth designations with guidance on how the different classifications of land can be delivered, including details of its accountable institutions, appropriate funding mechanisms and land-assembly powers.
- Treat viability as a delivery constraint to overcome, not a permanent ceiling on housing, affordable provision or infrastructure ambition.

- Assess workspace and housing replacement provision through functional equivalence, including affordability, location, specification and continuity, rather than floorspace alone.
- Establish common London-wide principles for affordable workspace policy where excessive local variation creates uncertainty, while retaining flexibility to reflect local markets and needs.
- Connect planning policy explicitly to transport, utilities, licensing, skills, housing finance and other systems necessary for implementation.
- Monitor completions, occupation and long-term outcomes rather than relying principally on permissions, allocations and opportunities announced.

Making best use of land and achieving Good Growth

Centre for London welcomes the direction of this chapter. The chapter marks a shift towards a more spatially directive, confident, infrastructure-led and delivery-conscious London Plan. Its emphasis on brownfield-first growth, minimum densities, sustainable transport connectivity, utilities sufficiency, small-sites delivery and high-quality design is closely aligned with Centre for London's research and advocacy for the capital's built environment.

However, as it stands, the draft Plan is less clear on how it will direct its land-use policies into actual delivery. The policies will only succeed and have positive, long-lasting effects on urban development if the Plan provides boroughs, the GLA, TfL, utilities providers, public landowners and developers with the certainty needed to unlock complex sites, coordinate infrastructure, and apply standards consistently. The final Plan should therefore strengthen its approach to land assembly, infrastructure funding, delivery capacity, utilities governance, and the monitoring of strategic growth locations.

MBUL1 Spatial strategy

Centre for London welcomes the updated spatial strategy and supports its extended focus towards a 20-year delivery timeline. This is an important, strategic policy which provides the crucial citywide framework which integrates housing, transport, economy and the environment. We are especially supportive of a reviewed typology which clearly sets out the spatial significance of distinct parts of London. This was a concern we had raised in our response to the Towards a new London Plan consultation in relation to the delisting of Opportunity Areas from the planning map.

Centre for London also acknowledges and welcomes the greater emphasis on increasing density in existing growth corridors, including the Lea Valley, Thames Gateway and Old Oak Common area. In our research reports in partnership with the Local London and West London Alliance sub-regional partnerships, this focus on densification and boosting corridor-based brownfield growth is a positive planning strategy for the region.

It is also significant that the draft London Plan more actively considers transport connectivity to be an important aspect of growth and development. It is therefore encouraging that the draft Plan has maintained the strategic visibility of major projects like Crossrail 2, the Bakerloo line extension, and West London Orbital. It is also very encouraging to see the significance of including metroisation of the North London inners, Southern and Southeastern railway services as higher priority. Centre for London recommends that the GLA makes a bolder case for metroisation and its impact on economic growth and development. This includes the potential for the benefits of metroisation to include suburban rail lines in West and North East London.

However, while Centre for London welcomes the development of MBUL1, it is disappointing that the implementation and rationale of the policy does not fully outline the delivery architecture needed to boost growth in the allocated areas. As per our Towards a new London Plan

consultation response, as well as our 2024 Rebooting London's Economy research report, it is vital to set out the organisational and governance capacity for new major areas of regeneration, namely, the establishment of new development corporations. To boost public land assembly capacity and ensure the pipeline of infrastructure improvements set out in MBUL1 can be delivered, we would recommend that the policy have a clearer sense of how areas can grow, and what capacity is needed to deliver that growth.

MBUL2 Optimising the use of land and site capacity

Centre for London strongly supports the proposed introduction of an Optimisation Framework and its new Sustainable Access Measure levels to guide minimum residential densities. In order to support greater densities on brownfield and newly unlocked greenfield land, London needs a much clearer strategic planning policy for achieving higher densities on large and small sites. Centre for London advocated for the reintroduction of minimum density standards in our response to the Towards a new London Plan consultation and have further recommended that the Greater London Authority introduce a London-wide Small Sites strategy covering density, infill and delivery capacity. Centre for London therefore welcomes the Mayor's commitment to publishing a Small Sites Design guide as step towards unlocking a greater capacity of land to deliver homes.

While it is noted that the proposed policy does include acknowledging differences in borough densities, the implementation of this new policy and any subsequent design codes for small sites should be well-attuned to individual borough circumstances through a clearer implementation framework. It is disappointing that the proposed policy does not set out how the Greater London Authority would seek to work with or coordinate on density strategy with different boroughs, and we would welcome the opportunity to contribute to this. Furthermore, we would recommend that the Greater London Authority supports planning authorities through dedicated density policy officers who can assist directly at a borough level. This approach will not only aid the implementation of new policy but may also improve the interpretation of planning applications and their permissions once at that stage.

MBUL3 Tall buildings

Centre for London broadly welcomes the clearer strategic guidance on tall buildings, their heights and massing in appropriate locations. As per our response to the Towards a new London Plan, as well as subsequent advocacy on economic growth and business development in the capital, the importance of high density sites in Inner London especially is most appropriate when connected to London's strategic transport network.

We welcome the opportunity for tall buildings to develop in areas with high levels of transport connectivity, including where specialist clusters of economic activity can thrive. In our 2025 report on West London's Growth Potential, we highlighted the opportunity for boosting delivery of commercial and industrial development in strategic sites in West London. Similarly, our report on Local London's Vision for growth raised the economic potential in East London's industry clusters. To match the ambition set out by MBUL1 and MBUL2, this proposed policy should set out a clearer set of criteria for when and how new tall building clusters can be created. This would also ensure that local authorities operating within Opportunity Areas with high growth potential can interpret planning guidance on tall buildings more clearly.

MBUL4 Utilities: capacity, connectivity and resilience

Centre for London welcomes the renewed direction on London's utilities and supports the proposed policy's interpretation of what the built environment needs from London government to

develop and thrive. The detailed concept of 'strategic sufficiency' as a minimum standard of provision aligns with the Centre's advocacy on utilities governance and operations in the capital. As per our research and advocacy under our Decarbonising London research programme, we welcome the clearer systems perspective which sits across utilities demand, supply and resilience, while looking to provide the right growth foundations for every new development.

While we support the proposed policy's assessment of need for utilities in the capital, we believe that the capital's planning system requires much deeper reform and service coordination in order to deliver on the London Plan's ambition. The opportunities presented by the prospect for newly devolved responsibilities in utilities policy, including the option to devolve ownership of water and energy infrastructure, should be fully considered by the Greater London Authority and integrated into the new London Plan where appropriate. There is a clear need for a more strategic, devolved approach to utility provision to unlock land currently blocked for development by a lack of grid capacity, as evidenced by our research with the West London Alliance, Ealing Council and Imperial College London on the growth potential for West London. We have also provided evidence to London Assembly sessions on this area of policy and recognise the importance of a more joined-up, integrated utilities distribution system in the capital. Until this broader devolution is delivered, Centre for London is concerned that future development will continue to face the same challenges in planning and land assembly.

MBUL5 Sustainable transport to enable London's growth

Centre for London supports the proposed measures to require developments to assess and mitigate impacts on the transport network, as well as promoting the delivery of active travel infrastructure in new housing and commercial developments. We also welcome the acknowledgement of the benefits to transport connectivity and housing development from the policy to build large new developments around built-up transport hubs, including in the Green Belt.

As found in our 2023 report on urban logistics hubs, we also welcome the policy directions for safe, clean and efficient freight in built-up areas. With urban logistics vehicles and freight distribution accounting for a significant rise in transport-related carbon emissions since the pandemic, as discussed in our 2023 report, it is important that new developments are supported by sustainable and shared modes of freight distribution, including the potential to design in new rail, water and active transport logistics hubs in Local Plan site allocations.

We recognise that spatial planning policy alone is not sufficient to deliver the level of transport infrastructure needed to unlock new sites and build the homes and businesses which London needs. But where infrastructure funding can be achieved, such as through Community Infrastructure Levy contributions or delivered at a local level through TfL's Local Implementation Plans, this should be well-coordinated to local and regional growth priorities. The Greater London Authority should, therefore, evidence how its MBUL5 policy will achieve the vision for infrastructure delivery found in the London Infrastructure Framework, jointly designed by the Mayor of London and London Councils. This will underpin the development of Local Plans and their site allocations from an early stage and feed into the planning application system.

MBUL6 High quality design for a growing, changing city

Centre for London supports the introduction of the proposed policy and its dedicated requirements for Local Plans to integrate the latest climate change risk modelling into their site allocations and planning strategy for resilience. As highlighted in our Homes Fit for Londoners report from 2023, and in subsequent advocacy on housing design and building safety from

Delivering the Homes London Needs, it is crucial that all Londoners live in homes which meet the Decent Homes Standard and are protected from adverse climate, safety or social insecurity. The proposed Plan's emphasis on promoting early design review proceedings and embedding climate resilience into the delivery and design of new schemes is welcome.

As per our diagnosis of the housing crisis found in Delivering the Homes London Needs, the implementation of building safety regulations, climate resilience measures and regulatory reforms in the past decade have increased the cost of delivery on housing schemes while increasing viability risk, alongside other factors such as construction costs, finance and market conditions. While it is crucial that new developments are delivered to the highest possible environmental standards, the London Plan has a significant role in smoothing the process for planning applications by refining design and safety standards to be more clear, consistent and deliverable. In Delivering the Homes London Needs, we recommended that the Greater London Authority publish key design tests as checkable parameters for planning applications, while reducing the risk of delay at Building Safety Regulator Gateway 2 via improved pre-application guidance. These design tests should be prioritised for high-rise and mid-rise residential buildings, but the London Plan should ensure that its parameters for safe, secure and resilient new housing produces high quality homes regardless of tenure, size or storey.

Centre for London supports the proposed policy's approach to environmental standards and improvements in building design. The integration of climate adaptations into new building designs is essential to reduce carbon emissions and improve urban resilience. We also welcome the promoted adaptations of external shading and active frontages to reduce negative impacts of climate change on communities and homes. As discussed in our 2023 report on Reducing Street Clutter in Central London, environmental factors have significant impacts on community, health and climate resilience, and ultimately create a negative economic impression on local areas. It is positive to see the direction of this report echoed in the MBUL6 policy, and we welcome the improvements that such as policy will bring.

MBUL7 London's heritage

Centre for London does not make a substantive representation on this policy.

MBUL8 Inclusive design

Centre for London welcomes the proposed policy for development to contribute to inclusive built environment and public realm. As an urban think tank, Centre for London has long supported the principles of inclusive design in placemaking, housing delivery and community building, including through our research in collaboration with Kensington and Chelsea Council on the successful, sustainable placemaking of High Street Kensington. As stated in our response to the Towards a new London Plan consultation, there is clear need to integrate the principles of health and social equity into the development of our town and city centres, while ensuring there is a pipeline of specialist and accessible homes in social housing.

To demonstrate the strength of this integration of inclusive design principles in spatial planning, the new London Plan should go further than setting out a vision and provide evidence to both policymakers and developers on the viability, proportionality and clarity of implementation for inclusive design principles in different schemes. This could be incorporated to the same level of detail as with health and safety regulations to establish London as a benchmark city for inclusive design. The importance of improving built environment inclusivity is explored in our 2025 report on Healthy Placemaking in London Bridge, but as found in our 2026 report, Delivering the Homes

London Needs, there is also a need to streamline the planning process and frontload requirements in design and developer contributions to ensure that development is completed and viable to deliver. As such, we would welcome published guidance to include any key tests or guidelines for delivery, particularly new homes, so to avoid uncertainty in interpretation and maximise the number of homes which are delivered to this high standard of inclusivity.

MBUL9 Healthy streets and public realm

Centre for London welcomes the proposed policy on healthy streets, including the continued endorsement of the Healthy Streets Approach as a benchmark for developing a safe, welcoming and sustainable urban realm. The policy itself is clear in its rationale for implementing a Healthy Streets design framework, but the proposed approach is less clear on how this will be implemented or endorsed at a borough level.

Currently, two of the main sources of funding for boroughs to deliver Healthy Streets related infrastructure are set out under Community Infrastructure Levy charging schedules or through the Local Implementation Plans, funded by Transport for London. Local authorities may make direct improvements to local and community infrastructure, but these will largely be dependent on grant funding or partnerships. The potential for funded improvements to the public realm made by private developers are under strain due to their impact on overall development viability, as explained in our recommendation to streamline developer contributions in Delivering the Homes London Needs.

As such, while the policy for a Healthy Streets Approach is positive and should be pursued, it remains a weakness of the draft Plan that there is less of a clear direction on how local authorities will fund, coordinate and maintain public realm improvements desired by the policy. It is concerning that the draft London Plan does not indicate how this policy will integrate with existing methods for delivering local (?) infrastructure, and we would recommend that the draft Plan outline how boroughs can interpret it as part of their own programmes, not just private development.

MBUL10 Security and safety

Centre for London welcomes the proposed policy and rationale for its delivery. It is encouraging that the Greater London Authority is more actively shaping and engaging planning authorities in the regulation of and improvements to fire & building safety in the capital's built environment. This aligns with our recommendation from Delivering the Homes London Needs on the strategic importance of the Mayor of London to oversee and guide building safety policy interpretation, including the refinement of design standards.

With London's residential high-rises a major concern for fire safety, retrofit and wider safety improvements, the draft London Plan should more clearly set out the relationship between planning authorities, the Greater London Authority, and regulatory bodies like the Building Safety Regulator. The different layers of governance in the building safety process requires strategic spatial planning to set the terms of engagement and ensure robust scrutiny of applications. As such, the draft Plan should seek to develop and formalise its guidance on the role of each authority in the process of applying this process, so that boroughs are not faced with inconsistent decision-making or duplication across different layers of governance.

More widely, Centre for London is concerned that the proposed policy leaves considerable gaps in interpretation for safety and security in the public realm. As discussed in our 2021 research report on improving lighting in London, the provision of lighting in public spaces is a key aspect of safety for women and girls in dense, urban areas. While the issue is discussed in MBUL9 as part of a

broader framework on healthy streets, we recommend that the Plan includes greater detail on the aspects of public realm infrastructure which Londoners rely on to feel safe.

Delivering the homes and neighbourhoods Londoners need

HN1 Increasing London's housing stock

Centre for London welcomes the draft Plan's recognition that London needs substantially more homes and its ambition to increase delivery over the coming decades. As discussed in our 2026 report, *Delivering the Homes London Needs*, the viability for building significant volumes of homes has decreased significantly. The 'perfect storm' of new regulatory environments, high inflation and interest rates, increased labour and material costs, the reduction in housing market finance options for first-time buyers, and planning reforms have all contributed to the draft London Plan being considerably more cautious in its housing ambition than previous editions.

The draft Plan is right to distinguish between housing need and housing capacity, but it is not sufficiently ambitious in its depth of policy for closing the gap between the two. Centre for London's analysis suggests that stronger interventions in housing and planning strategy could enable higher levels of delivery than those currently set as a minimum 'floor'. The proposed target may represent what London can deliver under current challenging conditions, but it should not be mistaken for what London needs. A successful housing strategy should use its strategic housing targets to stretch the system where it can, drive reforms to boost delivery and coordinate investment to viable markets, rather than reflecting existing limitations. From this perspective, HN1 risks being more of a forecast than a suitable housing to meet the city's housing needs.

Centre for London does fully recognise this viability challenge and its effects on housing targets. And while there is a logic to planning more cautiously for a 10-year period where viability is lower, fundamentally, the minimum housing target of 558,451 homes over 10 years set out in this policy are far below those which central government has calculated. This presents a risk in the draft Plan being considered incompatible with national planning policy, while also reducing the ability of boroughs, developers, registered providers and investors to interpret the London Plan as in lockstep with national guidance.

Developers and housing associations who have engaged with Centre for London as part of its housing research have strongly called for greater clarity in the expectations of planning policy and the authorities which approve housing delivery. As such, there is a risk that the draft Plan's approach to housing target risks confusion for the development sector by presenting an uncertain variety of strategic needs.

For example, in the *Towards a new London Plan* consultation, the given government target was 87,992 per year or approximately 880,000 homes over the Plan's 10-year duration. The Government's standard method calculated London's housing need at around 850,000 homes from 2027-28 to 2036-37, but this further reduced by around 300,000 homes to meet the Mayoral target in line with viability concerns. Looking more closely at borough Strategic Housing Market Assessment (SHMA) figures, which are developed solely for Local Plan development rather than at a London-wide level, there are some key inconsistencies – not least from the SHMA's need figure setting out a requirement of 89,300 homes a year.

At a borough level, Kingston Council, which is consulting on its latest draft Local Plan, has set out planning policy to deliver 964 homes a year as per the existing London Plan requirements. This requirement has since fallen by 30% to 687 homes a year based on the trajectory the Mayoral target presents. This inconsistency extends to the flat number of homes required as well as the

effects it has on spatial strategy and sequencing for delivery. Where Kingston is currently proposing selective release of land to increase capacity for a 964-home target, the draft London Plan only takes brownfield sites into account. This shift in target, even from a position of reflecting viability, makes it difficult to explain and justify where local assessed needs are materially different. A similar tension between existing assessments and evidence of housing need can be found through the Local Plan evidence of Tower Hamlets and Barking and Dagenham, both of which have incorporated housing targets of different tenures and uses which are different to that of the Mayoral target.

This approach to housing targets also creates an issue for monitoring housing delivery performance with boroughs being required to plan 'positively' for additional capacity, despite several authorities being required to revisit their plans for land designation. The distinguishing of theoretical pipeline and ambition-driven capacity may contribute to confusion in interpreting long-term planning for site allocations and drive different approaches to unlocking new public or private land for redevelopment. This also affects how far and where local authorities should be planning new local infrastructure and amenities. As discussed in our Delivering the Homes London Needs, housing developers and investors require certainty and clarity to pursue development decisions. Our recommendation to carry out stronger monitoring of development finance metrics to promote private investment in housing provides an accessible 'dashboard' for such decisions. While Centre for London supports long-term planning to support consistent and ambitious housing delivery, the current draft Plan converts uncertainty on viability into a less transparent pipeline with operational challenges for interpretation, regulation and monitoring.

As discussed in Delivering the Homes London Needs, increasing housing supply is essential to improving affordability in the long-term. However, it also demonstrates that London has repeatedly failed to achieve housing ambitions because the system lacks the capacity, incentives and delivery mechanisms required to reach them. Rather than adjusting targets to reflect current viability constraints, the draft Plan should focus on overcoming those constraints through planning reform, encouraging investment in infrastructure, boosting public sector delivery capacity, and implementing more effective funding models for affordable housing. By basing housing targets largely on estimated, constrained capacity within the existing system, the draft Plan risks institutionalising under-delivery and accepting a level of housing growth that falls significantly short of London's assessed need.

HN2 Protecting and reshaping housing

Centre for London supports this policy and its intention for protecting and making better use of housing stock. This follows the central diagnosis of our 2026 Delivering the Homes London Needs report, which finds that London's housing crisis is not just about supply but distribution, tenure and access too. Our research finds that while available housing floorspace has increased by 28.8% between 2004 and 2023, this has been overwhelmingly accrued by owner-occupiers and higher-income households. These findings support the core purpose of HN2 in implementing planning policy which considers the protection, management and retention of existing homes important alongside net additions.

We also support the proposed policy of protections for existing social housing, including council housing. As evidenced in Delivering the Homes London Needs, the 20% decline in the number of affordable homes per 1,000 residents between 2002 and 2024 has worsened housing outcomes for vulnerable Londoners who are unable to clear the financial barrier to owner-occupation. Ensuring that there is a minimum safeguard to replace demolished social housing with floorspace in the same tenure is essential to maintain the functional ability of London's aggregate housing stock to

meet need. Centre for London also welcomes the more open, flexible approach to approving alternatives before demolition of social housing, including making better use of existing assets. This is a complex but well-developed policy which rightly recognises the importance of delivering upgrades to retain usable housing.

Where there is less clarity in the proposed policy is on where the London Plan can more actively reshape how stock is used and distributed. As evidenced by our floorspace analysis in *Delivering the Homes London Needs*, the inequitable distribution of floorspace in the capital is a significant cause for much of London's housing inequality. While not directly building more homes, incentivising rightsizing, helping households downsize and releasing underused homes should be considered as viable policy levers for delivering the homes London needs. While some of these policy drivers sit outside of planning, tightening the scope of the proposed replacement tests could ensure that reprovioned homes, in the event of demolition and redevelopment, would produce the outcome and provide for the same needs.

Centre for London would support development of a strategy sitting across planning, housing and finance which promoted rightsizing as a viable method for maximising housing supply. Measuring floorspace alone does not ensure that replacement homes make the same provision. Therefore, HN2 should require reprovion to respond to evidenced need for family-sized, accessible, supported and specialist housing, alongside the existing tenure and floorspace test. This should include giving clearer priority to local reprovion where possible, including on estate regeneration schemes.

HN3 Delivering affordable housing

Centre for London supports the continued strategic ambition to maximise the number of homes delivered to be genuinely affordable, alongside the proposed collective targets to deliver 238,430 low-cost rent homes and 129,020 intermediate homes by 2037.¹ We also welcome the policy's recognition that affordable housing is not only essential to meeting acute social need but is fundamental to London's economic success.

Centre for London's research has consistently argued that London's housing crisis is not simply a shortage of units, but a failure to provide homes at the cost, tenure, size and quality that Londoners need. Our recent research found that London has more residential floorspace per person than it did two decades ago, but that these gains have disproportionately benefited higher-income homeowners, and that this is in part driven by the declining availability of social housing per resident. Increasing the supply of genuinely affordable homes, particularly social rent, must therefore remain at the centre of London's housing strategy.

We also consider the retention of a Threshold Approach based on different locations and land profiles in the city to be a more nuanced and logical approach to viability. This should reduce the risk of protracted viability negotiations, assessments and examinations and provide developers and boroughs with more certainty. The case for differentiating fast-track thresholds according to location or land profile is also reasonable under the circumstances of the change in overall affordability threshold. This method is broadly aligned with Centre for London's strategic recommendation for a more spatially sensitive, zonal approach to land use and planning. Through this change to affordable housing development, it may help more marginal or stalled sites through the process and into delivery.

¹ These are the updated figures found in the corrected Draft Plan published on 1 September 2026.

However, the new approach contains a significant conflict between the Plan's long-term ambition and its operational expectations. By formalising lower thresholds in parts of London where development is currently less viable, the policy risks hard wiring a reduced expectation for affordable housing into land values and development decisions. This is particularly concerning where lower-value development markets overlap with high levels of housing need, overcrowding, homelessness and pressure on temporary accommodation. This pressure is more acute in parts of London but there are no boroughs which are free from the development and housing challenges described.

A viability-sensitive threshold may represent an honest assessment of what the present market can support, but it should not become a permanent ceiling on what those areas can expect, nor should the changes be considered a 'race to the bottom' for other boroughs wanting to reduce affordable housing thresholds. The final Plan should therefore set out a clear process for reviewing and raising thresholds as market conditions improve, supported by transparent evidence on land values, viability, finance and sales rates, planning permissions, starts and affordable housing completions. The policy currently allows borough-wide thresholds to be increased through robust local viability evidence, but monitoring should also establish whether the locational bands are producing materially different housing outcomes and whether lower initial thresholds are genuinely accelerating overall and affordable delivery.

Fundamentally, HN3 remains far too dependent on a well-functioning cross-subsidy model where availability of public grant through the London Social and Affordable Housing Programme (LSAHP), and via planning gain through Section 106 agreements can generate the level of affordable housing needed by both the London Plan and by communities. Centre for London's Delivering the Homes London Needs research shows that negotiated planning gain is vulnerable to changes in costs, finance and market demand. As viability weakens, both private delivery and affordable housing contributions have come under pressure.

A planning threshold can regulate the percentage of affordable schemes that proceed, but it cannot itself provide the subsidy, public borrowing, land assembly or institutional capacity needed to deliver social housing at the scale London requires. Our research therefore recommends a larger and more flexible affordable housing settlement, a Greater London Housing Fund capable of pooling public and private investment, flexibility for low-cost lending for councils and registered providers, and counter-cyclical acquisition arrangements that allow the social sector to purchase suitable homes when private sales slow. As a functional process, we also recommend that larger schemes identify a social-sector partner at planning stage so that affordable homes are designed from the outset to meet provider requirements and are less likely to become unsuitable for acquisition later.

Unless HN3 engages with the reality of the unstable and historically weak relationship between private and affordable housing delivery, it will not deliver the quantity of homes needed and will underperform. As such, the final policy should be accompanied by a wider affordable housing delivery strategy that distinguishes clearly between what can be secured through planning obligations and what requires grant, borrowing, public land, acquisitions and direct municipal or registered-provider delivery. The Plan itself acknowledges that the scale of the affordable homes required to meet need is substantial, where even the £11.7 billion LSAHP is insufficient to deliver enough homes. The success of HN3 should therefore not be judged only by the percentage negotiated at planning consent. It should also be assessed through the number, tenure, size and affordability of homes completed, the additional grant secured from government, the delivery partnerships secured and delivered, the speed with which affordable units are transferred to providers, and the extent to which delivery is sustained through different market cycles.

Centre for London is also concerned about the proposed circumstances in which affordable housing thresholds may be further reduced or undermined to support strategic infrastructure which requires additional, non-housing funding streams. We recognise that major transport and health infrastructure can be indispensable to unlocking development and may generate substantial public value. However, if an altered requirement allows the Green Belt threshold to fall from 50% to 35%, or the public-land threshold from 40% to 25%, risks making affordable housing the bargaining chip used to fund infrastructure that should benefit the scheme as a whole. This is especially the case where other funding streams from government, boroughs or the private sector are primarily responsible for the delivery of supporting infrastructure.

Any reduction should therefore be exceptional, transparent and based on independently tested evidence. It should demonstrate that the infrastructure is necessary to make the development possible, that alternative public funding and land-value-capture mechanisms have been exhausted, and that the reduction represents the minimum required. Review mechanisms should restore affordable housing where infrastructure costs fall or scheme viability improves, while later phases should be expected to recover any affordable housing reduced at the outset.

Overall, Centre for London supports the direction of HN3, including its strategic 50% target, stronger emphasis on social rent, and attempt to make affordable housing requirements clearer and more responsive to local viability. However, market realism should not be mistaken for a fair and complete affordable housing strategy. Unless lower thresholds are reviewed regularly, infrastructure flexibilities tightly controlled and planning obligations reinforced by much greater LSAHP grant, public investment, acquisition and provider capacity, the policy risks institutionalising weaker affordable housing delivery rather than overcoming the conditions that have caused it.

Infrastructure necessary to make strategic development sustainable, particularly on Green Belt land, should be funded through a coordinated package of public investment, land-value capture and proportionate developer contributions. Affordable housing should not routinely function as the residual source of scheme viability. The final Plan should retain the methodology for a Threshold Approach, but place it within a stronger, counter-cyclical and publicly led delivery framework capable of increasing affordable housing provision when the market is weak as well as when it is strong.

HN4 Gypsy and Traveller accommodation

Centre for London does not make a substantive representation on this policy.

HN5 Managing specialist accommodation

London's housing needs cannot be met solely through conventional self-contained market and affordable housing. Centre for London welcomes this recognition in HN5. Purpose-built student accommodation (PBSA), supported housing, older people's housing, community-led housing and other specialist models serve different groups and perform distinct functions within the wider London housing system. Planning positively for these forms of accommodation can improve housing choice, support health and independence, and help ensure that people are not required to remain in homes that no longer meet their circumstances. However, we argue that planning policy must avoid treating these fundamentally different forms of housing as a single category separated from the broader housing market, both public and private. Their affordability, tenure, management arrangements, resident needs and effects on the wider housing market vary considerably and require correspondingly distinct policy tests.

Centre for London supports the introduction of clearer London-wide requirements for specialist housing. The targets set for specialist housing models are an important improvement on an approach that relies primarily on individual boroughs identifying and meeting specialist needs through their local plans. Local evidence remains essential, particularly because requirements for supported accommodation can be highly specific to community needs. However, it is a reasonable justification that borough-led assessments alone risk producing an uneven pattern of provision, especially where specialist housing competes with conventional housing for scarce land, finance and delivery capacity. Centre for London accepts and supports the need for a strategic framework to ensure that less commercially attractive forms of accommodation are not consistently displaced by higher-value products.

This approach is broadly consistent with Centre for London's response to the Towards a new London Plan consultation, which called for a more strategic framework for older people's housing. Our 2021 Third Age City research report also found that older Londoners faced an increasingly unaffordable market alongside insufficient choice of suitable and care-supported homes. It remains our recommendation that the Mayor introduce an older people's specialist housing target for large sites, initially equivalent to 5% of completions and subject to the same affordability expectations as the wider development. We also recommend that borough local plans embed this target guided by a London-wide benchmark. HN5 represents considerable progress towards the second of these recommendations by establishing borough-level evidence and minimum needs figures, but it does not impose a clear requirement on large developments to make a direct contribution to specialist provision.

Centre for London therefore recommends that HN5 be strengthened by requiring large residential-led developments to assess whether a proportion of their homes could be designed or managed as older people's or specialist accommodation. This should not necessarily involve a rigid 5% requirement in every location. The appropriate tenure, type and amount should respond to strategic and local evidence, transport accessibility, proximity to health and community services and the suitability of the development for independent or supported living. However, requiring the need to be assessed would ensure that specialist provision is considered at the outset of master planning rather than only where a dedicated operator brings forward a standalone proposal. It would also give boroughs a more effective mechanism for translating the needs identified in Table 3.7 into site allocations and completed homes.

Older people's housing should also be treated as part of a broader strategy for improving how London's existing housing stock is used. Centre for London's Delivering the Homes London Needs report demonstrates that London's housing crisis is shaped considerably by the distribution and circulation of homes as well as by its overall supply. Our 2024 research with The G15 on social housing allocations found that downsizing is frequently constrained by a shortage of suitable, affordable and accessible alternatives, rather than simply by an unwillingness to move. This was subsequently revisited in an inquiry by the London Assembly Housing Committee. Our research has found that financial incentives are unlikely to be sufficient where local housing availability is low or where moving would weaken established family, care and community connections. Delivering attractive and affordable specialist housing can therefore benefit not only its residents but the wider housing system by enabling some larger homes to become available for households requiring additional bedrooms.

As drafted, the Plan makes greater attempts at ensuring older people's housing is integrated into communities with sufficient levels of health and social care service. Centre for London's research produced in partnership with ARCO highlighted the shortage of Integrated Retirement Communities and proposed that every borough should provide such an option, allowing older Londoners to

combine independent living with access to on-site services and support. HN5 should therefore also give greater attention to the diversity of older people's housing, including affordable rented provision, private retirement housing, supported housing and integrated retirement models, rather than treating older people's accommodation as a single market.

Separately, Centre for London broadly supports HN5's positive approach to purpose-built student accommodation. PBSA provides vital bespoke homes for students attending London's world-leading universities and colleges, and the draft Plan correctly argues that it can reduce pressure on conventional private rented housing by accommodating students who might otherwise occupy, HMOs, shared houses or flats. The introduction of borough-level targets and the requirement for schemes to be well connected to higher education institutions, services and public transport provide a clearer basis for directing this development towards suitable locations.

We argue that the policy is also right to require boroughs to identify concentrations of PBSA relative to conventional housing and consider their effects on mixed and inclusive neighbourhoods. PBSA can contribute positively to regeneration, institutional growth and town-centre vitality, but it does not meet conventional housing need in the same way as a standard home as measured by the London Plan. In places where PBSA has become disproportionately attractive, such as Stratford or Vauxhall, because it offers a more viable or rapidly deliverable development model, there is a risk that it displaces developable land that could otherwise support general-needs or affordable housing. Centre for London therefore argues that the Plan should require boroughs to assess PBSA not only against evidence of student demand but also against the opportunity cost for conventional housing, affordable provision, employment space and local social infrastructure. This assessment should be especially robust where PBSA is proposed on sites already allocated in Local Plans for housing-led development.

Centre for London also recommends stronger monitoring of the relationship between PBSA and the private rented sector. The proposition that additional PBSA releases conventional rented homes is credible in pure numbers, but the scale and location of this effect should be tested rather than assumed. The effects of PBSA on local economic activity and productivity should also be tested rather than assumed. Strategic monitoring at a London Plan level would enable future PBSA targets to be adjusted according to demonstrated housing-system outcomes rather than development completions alone. The draft Plan already states that PBSA targets will be kept under review in response to changes in the higher education sector, providing a suitable basis for this broader assessment. This monitoring approach should also be applied to large-scale purpose-built shared living, particularly for its market effects and impact on conventional housing and affordable housing supply on-site.

Overall, Centre for London supports the strategic direction of HN5. It is right to recognise that London needs a wider range of homes and accommodation models, to introduce PBSA and specialist-housing needs figures, to plan positively for older people's housing, and to manage concentrations of PBSA and shared living. However, its different elements should be more clearly separated and connected to distinct delivery mechanisms. Older people's housing requires stronger links to site allocation, health and social-care commissioning, affordability and provider capacity. PBSA and shared living requires monitoring of its effects on conventional housing and neighbourhood balance. The final policy should therefore move beyond counting units or bedspaces and establish whether specialist accommodation is genuinely meeting identified need, improving housing choice and contributing positively to the functioning of London's wider housing system.

HN6 Build to Rent

Centre for London supports the draft London Plan's positive approach to Build to Rent and its recognition that London cannot rely solely on homes built for individual sale to meet its housing targets. London needs a thriving, viable and high-quality private rented sector to support population needs. Build to Rent broadens the sources of investment in new housing on large sites, leased progressively and in a way which reduces development exposure to the rate at which market housing is absorbed by purchasers. This gives the sector a key role in supporting a more continuous construction and accelerating build-out, particularly on large or multi-phase developments.

Our research in Delivering the Homes London Needs supports the continued expansion of private housing supply to help support long-term price stability but also finds that planning permission of new homes for sale does not guarantee delivery alone. A model that introduces institutional investment and does not depend exclusively on individual sales can complement conventional development and help reduce reliance on a narrow range of developers, financing models and routes to market.

The framework provided by HN6 is an appropriate, basic starting point for the planning regulation of the sector. We particularly welcome the requirement for developers of Build to Rent to consider the affordability effects of any service charges on long-term affordability. For any affordable housing provided as part of a Build to Rent scheme, a discounted rent would not feel like an affordable home if compulsory service charges, utility arrangements or other fees place the total cost beyond the reach of the intended household's affordability. To improve this outcome, Centre for London recommends that the policy be enhanced to define affordability in reference to the total recurring cost of occupation, rather than just rent alone. This should be disclosed at the planning stage for development, in corporate service documents, and in any compulsory tenancy documentation. Tenants in Build to Rent affordable homes should not be surprised by shifted costs from controlled rents into weakly regulated service charges.

Centre for London also acknowledges the inclusion of Key Worker Living Rent within the affordable component of Build to Rent schemes. As our consultation response for Towards a new London Plan stated, there is a reasonable case for a new intermediate-rent product for key workers, particularly in high-cost areas where essential workers are unlikely to obtain social housing but cannot reasonably afford open-market rents or home ownership. However, we believe that the success of this tenure will depend on whether rents are genuinely linked to local incomes and whether eligible households can access homes close to their employment. We previously recommended concentrating the greater proportion of Key Worker Living Rent provision in Inner London, where housing costs create especially severe recruitment and retention pressures. HN6 should therefore be updated to require boroughs and applicants to demonstrate how the location, rent and allocation arrangements of these homes respond to identified workforce needs.

While we broadly support the need for a positive Build to Rent strategy, this should not, however, become an assumption that every Build to Rent proposal necessarily represents additional supply or accelerates delivery. Planning authorities should assess whether a scheme introduces genuinely additional investment into the system, enables parallel delivery on a large site or brings forward development that would otherwise stall if it were conventional housing. To ensure Build to Rent is delivering efficiently, the GLA and boroughs should monitor the delivery of the tenure to test the Plan's proposition that Build to Rent reduces market absorption constraints and to understand where it has produced faster or more resilient delivery in practice. Monitoring should compare

planning permissions, construction starts, completion rates and occupation, rather than treating allocated sites or consented units as delivered homes.

The Plan must also distinguish between encouraging additional institutional investment and allowing Build to Rent to displace other forms of housing without a clear public benefit. On sites allocated for conventional or affordable housing, applicants should demonstrate that a Build to Rent proposal will improve delivery, tenure diversity, affordability or long-term management. Build to Rent is a valuable part of the housing system, but it is not a substitute for social rent.

As detailed in our Delivering the Homes London Needs report, Centre for London argues that there is a more counter-cyclical role for public sector-led Build to Rent development in the planning system. We recommend that HN6 be expanded to introduce a specific Municipal Build to Rent sub-category. These schemes would be delivered and managed by local authorities, council-owned housing companies or registered providers, including partnerships between these organisations. To qualify, developments would have to provide genuinely additional homes, satisfy defined quality requirements and meet the existing Build to Rent expectations relating to covenant, professional management and security of tenure.

This would create an intermediate rent option between social housing and the conventional private rented market. It would not replace social rent or compete for the same policy role as defined by the London Plan. Instead, it would meet the needs of households who are unlikely to secure a social home but cannot afford market rents, while expanding the capacity of councils and registered providers to deliver and manage good quality rental housing. Councils could use nomination rights to respond to locally identified need, while retaining long-term influence over affordability, quality and management.

The proposal would be supported by an enhanced Municipal Local Housing Allowance rate for qualifying homes. Centre for London has proposed that this be established as a specific uplift class, set at the 50th percentile of local rents and indexed annually to CPI. Eligibility would be restricted to accredited tenancies in genuinely additional homes delivered through the programme and meeting the Decent Homes Standard. The intention would be to link additional housing support directly to the creation of new, good-quality rented supply, rather than increasing subsidy in the existing private rented market without securing additional homes or improvements in quality.

This proposal would require national government participation as the London Plan cannot itself change Local Housing Allowance or Universal Credit arrangements. But to integrate the model for wider delivery, the Plan can establish the early spatial and development-management framework needed to pilot the model in different locations where an LHA-linked subsidy would unlock delivery. HN6 should set out terms for the definition of Municipal Build to Rent, identify eligible delivery bodies and establish the quality, additionality, affordability, management and covenant tests that a scheme would need to satisfy. The Mayor should then work with government, boroughs and registered providers to establish a London housing innovation programme through which initial developments could be tested.

Overall, Centre for London supports HN6 and the role it assigns to Build to Rent within a more diverse and constrained housing market. The policy rightly promotes the sector while recognising its potential to reduce dependence on individual sales and protecting affordable homes through perpetual affordability requirements. However, the adopted Plan should clearly strengthen its tests of total housing cost, additionality, tenure security, local need and actual delivery performance. Most importantly, it should use the new London Plan to establish Municipal Build to Rent as a defined sub-category and provide the planning framework for a time-limited, independently evaluated pilot. This would turn HN6 from a policy that principally accommodates an existing

investment product into one that also enables city and local government to test a genuinely new route to good quality intermediate rented supply.

HN7 Housing size mix

While the London Plan is, at its core, a spatial strategy to determine the location and number of homes for delivery, Centre for London fundamentally believes that housing delivery should not just be about the quantity of homes built, but also by whether new development provides homes of the sizes which Londoners need. As such, Centre for London broadly agrees with the findings of London's Strategic Housing Market Assessment and policy HN7 in its purpose to enable access of homes of an appropriate size, cost and tenure.

The policy is also right to recognise that the required size mix differs between affordable and market tenures. Centre for London's 2024 research on social housing waiting times found especially severe constraints in access to family-sized homes, with London households waiting an average of 1,863 days, or just over five years, for a three-bedroom social home in the data analysed at time of publication.

However, Centre for London believes that the HN7 policy should be much more strategically developed to make the reduction of overcrowding to be a more explicit policy objective. Housing size mix as policy area is discussed primarily in terms of making London attractive to families or allowing households to remain in the city as they have children. These are important aims overall, but the immediate concern is also whether children and adults already living in London have sufficient space. HN7 should therefore state clearly that securing an appropriate and fair size mix of homes is intended both to support family life and to reduce statutory overcrowding, bedroom deficits and prolonged occupation of unsuitable temporary accommodation.

The policy should also include more explicit aims to incentivise right-sizing through the delivery of appropriately sized homes. There is a clear need to ensure that there is enough homes for households living in overcrowded premises to move into more appropriate spaces. But this requires the planning environment to recognise the need for more active measures to reduce over-occupation. Centre for London's analysis from Delivering the Homes London Needs found that average floorspace per person increased by 28.8% between 2004 and 2023, but that the gains were unevenly distributed between tenure and income groups. We conclude that the impact of new supply depends upon its tenure, affordability and distribution, as well as the rules governing access to existing homes. Londoners who are more likely to be wealthier can experience an increase in average floorspace while some poorer households remain severely overcrowded. HN7 should use this distributional insight to distinguish between London-wide averages and the actual space available to households experiencing the greatest need.

Centre for London recognises the rationale for avoiding overly rigid housing mix requirements that could undermine viability, prevent site optimisation or reduce total delivery. The ability to provide larger homes varies according to site size, building form, construction costs and tenure. A uniform quota across every development could produce poor outcomes, particularly on smaller or constrained sites. The draft policy is therefore right to allow a range of evidence to shape individual schemes rather than imposing an identical mix everywhere. However, we would recommend that this viability-led approach should not be used as a routine reason to remove the number of larger affordable housing schemes. Larger homes may cost more to provide and generate fewer units from a given floorspace, but this is precisely why planning policy, affordable housing grant and public delivery must work together. Otherwise, the homes that are most difficult to deliver may also be those for which unmet need is greatest.

Where agreed family-sized affordable housing mix is reduced on viability grounds, the decision should be transparent and supported by evidence. Boroughs and the Mayor should monitor the cumulative effect of such changes to establish whether larger affordable homes are being systematically negotiated out of delivery. Public grant should be capable of supporting family-sized and specialist homes where their higher cost cannot reasonably be met through planning obligations alone.

Centre for London supports HN7's flexible, evidence-led approach and its recognition that London needs a range of housing sizes. However, the policy should be strengthened by treating housing size mix as an explicit instrument for reducing overcrowding as well as supporting family living. It should require borough and scheme-level evidence on bedroom deficits, waiting times, temporary accommodation and overcrowding by tenure. With London boroughs facing significant costs for delivering and managing affordable housing, the need to deliver a responsive housing size mix which meets the needs of Londoners is a priority.

HN8 Housing design

Centre for London does not make a substantive representation on this policy.

HN9 Accessible housing

Centre for London does not make a substantive representation on this policy.

HN10 Burial space

Centre for London does not make a substantive representation on this policy.

Growing London's economy in a way that benefits all

GLE1 Sufficient and appropriate employment space

Centre for London welcomes the principles set out under GLE1 to ensure that the capital has a strong supply of appropriately sized employment space to sustain economic growth. The proposed policy is right to require London planning authorities to provide a full range of employment spaces by type, space and price. We also welcome the continued recognition of new Class E floorspace's flexible use and its capability to adapt to different business models, sectors and market patterns. This is a position which Centre for London has long supported and highlighted in our 2022 report *Remixing Central London*, which called for greater flexibility of employment spaces to accommodate different commercial or third sector uses.

The proposed policy is being implemented at a crucial moment for London's economy, where the cost and availability of business space are not merely secondary property-market concerns. In our forthcoming report on London as a HQ City, we outline the importance of ensuring that the capital is protecting existing commercial space for offices as well as consenting to the delivery of more high-quality commercial space connected to the London transport network. This was also explored in our 2024 report on *Rebooting London's Economy* which found that high housing and office costs, driven partly by the undersupply of space, were increasing the cost of living and doing business and constraining investment in more productive assets. The report also identified weak investment in research and development as a constraint on innovation and productivity, which this draft also references as a priority for delivery as per the ambitions of the London Growth Plan.

While the proposed GLE1 policy is intended to capture the breadth of all London's commercial and employment space types, Centre for London is concerned that this policy is currently too general

to guide the spatial distribution and delivery of this space effectively. London does not operate as a single, homogenous commercial property market and each neighbourhood, borough and sub-region has distinct sectoral strengths, land markets and skills bases. With the draft Plan including a welcomed strategic pivot towards recognising the polycentric nature of London's economy and its diverse local markets, it is disappointing that this policy sets out a very general approach to local economic policy. As discussed in our 2026 Making Regeneration Work for London's Communities report, there is a priority to use planning to secure long-term benefit and represent the inherent strengths of local community experience. This policy may have been simplified to ensure the Plan is more succinct, but without interpreting local employment-land evidence constructively, there is a risk that the final Plan does not fully recognise the conditions needed to build a new economy for London or support its existing strengths.

Centre for London has demonstrated the importance of a more bespoke approach to local commercial and employment space through its sub-regional analyses. In West London's Growth Potential (2025) and the Local London Vision (2026), we identified the distinctive properties of majority Outer London borough economies and their increased competitiveness as a commercial market, particularly for industrial space. GLE1 should recognise that employment space can be guided by central principles of quality, capacity and infrastructure, but may not fully reflect the different sub-regional evidence of how this space can be developed.

This concern also extends to the definition and principles guiding Class E space. With the proposed policy currently written to be broad in scope and generally neutral on spatial specificity, there is a risk that the Class E policy is interpreted without reasonable assessment of building quality, capacity or infrastructure. Different businesses require very different spaces, loading infrastructure, ventilation, servicing arrangements, power and water supply, leases and fit-out. A generic commercial unit, as defined under the policy, may be technically capable of accommodating multiple uses but practically unsuitable or unaffordable for the firms that local and strategic economic plans seek to attract. The final London Plan should not seek to promote flexibility in the delivery of Class E space without also ensuring that the eventual commercial use is appropriate for the space it occupies.

This is especially the case for the business development of small and medium sized enterprises. Centre for London welcomes the policy's distinct requirement that any developments displacing these businesses existing on-site should re-provide suitable space where feasible or assist them to relocate. This helps existing economic uses flourish alongside new ventures and reduces the risk of displacing local businesses. In this instance, the policy should ensure that a 'suitable' space means more than just a similar square metre floorplate. As discussed in our 2022 report on Local Authority Assets, improving the information on how publicly controlled buildings are used, providing clearer social-value objectives and ensuring greater consistency in decisions to provide discounted rents should be encouraged to support local small businesses. This approach should also apply, where possible in terms of lease and value, to privately-owned premises as well.

As Class E established greater flexibility for commercial space, the proposed policy must also retain a strong distinction between flexibility and the uncontrolled loss of strategically important employment functions. Our Remixing Central London report found that changing office and retail demand can create opportunities for carefully managed mixed-use development, but poorly controlled conversion to residential use may weaken the Central Activities Zone's commercial and cultural functions. GLE1 should adopt a principle which enables conversion by targeting lower-quality or surplus space first while basing the process on a robust evidence base of sustained lack of demand, the quality of premises, and the cumulative effect of losses on the local economy. This

would protect the capacity needed for future business growth while maintaining flexibility over building uses.

Overall, Centre for London supports GLE1 and its recognition that London requires a diverse, adaptable and affordable supply of employment space. But in its current draft form, it is concerning that the policy does not reflect the spatial diversity, capacity or sectoral differences which drive a successful inclusive economy. The adopted policy should go further than its current draft by clearly linking its place visions to employment space measures through a clear understanding of employment capacity for London's boroughs, sub-regions, strategic clusters and growth corridors. This should be supported by stronger monitoring in the London Plan of what space is delivered, its specification and cost, who occupies it, and whether displaced businesses can return or relocate successfully. Without these changes, GLE1 risks viewing economic capacity primarily through total employment floorspace. With a more developed spatial framework for employment space, it could provide a stronger foundation for a polycentric London economy where businesses of different types and sizes can start, grow and thrive in the capital.

GLE2 Supply of industrial land

Centre for London supports the direction of the proposed GLE2 policy and the recognition that London's built environment requires sufficient and maintained industrial capacity in suitable locations. The policy appropriately defines the broadness of industrial land use and the sectoral composition therein. The draft Plan is right to recognise that demand for industrial land is increasing as a result of new economic uses, such as high-tech manufacturing and medtech, despite London having lost 24% of its industrial floorspace (square metres) between 2001 and 2020.

As our 2022 Making Space report, produced through the Industrial Land Commission, found, London requires stronger protection for industrial land, more intensive use of existing sites and additional industrial provision in new locations. Low vacancy rates on existing sites and rising operational and delivery costs threaten smaller firms and activities such as repair, recycling and production that generate significant economic and environmental value but cannot compete with higher-value land uses. This was further explored through our 2025 West London's Growth Potential report where the protection and expansion of strategic industrial space was a priority for growing economic centres such as Old Oak and Park Royal.

We welcome the continued recognition of Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS) as protected land classes. This reflects our previous recommendation to the Towards a new London Plan consultation that the new Plan should commit to no net loss of SIL or LSIS from the planning map. But as with our response to GLE1, the simple measure of gross floorspace or land area is not a sufficient guide to understanding economic output. Instead, the new GLE2 policy should measure functional industrial capacity which recognises the circumstances of a newly delivered or converted development. This includes monitoring the servicing, loading, infrastructure, affordability and workforce capacity of new, intensified and existing premises. A nominal increase in building floorspace, either by conversion or intensification, should not compensate for land release if the new space will not accommodate displaced activities.

Centre for London supports industrial intensification and well-designed co-location where these provide genuinely additional capacity. In East London industrial centres such as Blackhorse Road or Dagenham, greater support in the planning system to intensify premises or enable co-location could be genuinely impactful for both employment and housing outcomes. However, neither should

be assumed to work in every industrial location, particularly those in protected land. Multi-storey development may suit some businesses with a limited or lower logistics footprint but will not suit sites where activities require direct yard or protected vehicle access. Housing introduced alongside industry can also constrain noise, servicing and operating hours, while the same impact can limit desirability for new homeowners or renters. GLE2 should ensure that planning applications for intensification or co-location demonstrate occupier demand, operational feasibility and long-term compatibility, with any replacement industrial capacity completed within an agreed timeframe where it is being used to justify release of land.

Further to the potential for industrial land being used for residential development, Centre for London recognises that there is a clear need for connected and low value brownfield sites which can adeptly deliver homes. However, we are concerned that the policies in the Draft London Plan 2026 weakens the protection of industrial land by allowing planning authorities to identify specific locations for release by site allocations. This greater flexibility for releasing industrial land is a significant risk to already-limited capacity to build industrial developments, as the land developed on will not return to industrial use once built as housing. It would be lost from the planning map unless future policy reverses the land protection.

It is also visible from the draft London Plan's consultation evidence that the potential to deliver new homes on industrial land via co-location does not yield a high quantity of new units. During the current London Plan period, approximately 4,500 homes a year have received permission through industrial co-location schemes since 2019-20, although fewer than 40% are under construction or completed. As such, we would strongly recommend that the policy for more flexible release (also discussed in PV5) be reviewed to ensure any housing development on industrial land is conditional on robust evidence that the capacity is no longer required or can be replaced without weakening the wider industrial district. Delivered housing which is sited next to retained industry should also be designed and managed so that the existing and established businesses are not subsequently restricted or displaced.

Overall, Centre for London welcomes the continued protection and recognition of industrial land in the capital. The more flexible ability to intensify industrial land and potential for co-location of other uses, including housing, could genuinely boost the economic output of London and support supply chains across the country. However, we remain concerned that the policy does not have the strong safeguards needed to ensure land is not lost to residential development uses which may be better suited to sites elsewhere in the city. Without effective safeguards, the Plan could undermine its formal protection of designated industrial land by allowing London's industrial capacity to decline through the cumulative loss of undesignated sites, unaffordable or inefficient intensification, and poorly managed balance between industrial and residential use classes.

GLE3 Data centres

The introduction of a dedicated, strategic policy for the delivery of data centres in the London Plan is very welcome, and Centre for London supports the introduction of a bespoke planning policy to this effect. We recognise that data centres and their facilities are increasingly important to London's digital, communications and professional service economy, and that they provide essential infrastructure for businesses requiring secure and reliable data services. As per the ambitions under the London Growth Plan, their development can also strengthen London's attractiveness to investment and innovation-led businesses, particularly where facilities benefit from proximity to established digital and commercial clusters.

However, the economic case for data centres must be considered alongside their demands on land, electricity and water. It is encouraging that the draft GLE3 policy strongly reflects the need to ensure that data centres are delivered in areas with sufficient energy and water capacity to not underserve local residents and businesses. This is an improvement on current planning policy which is a more reactive approach and has a weaker application of the broader utilities and infrastructure policy context. This aligns with Centre for London's position on utilities which considers energy, water, waste and digital connectivity to be fundamental building blocks under which all development must be determined. Data centres demonstrate the need for this systems-led approach due to their greater on-site need for energy and water consumption.

Centre for London advocates for a data centre policy where the appropriate response is neither a blanket presumption in favour of data centres nor a general restriction on their delivery. Instead, the new London Plan should set out a strategic framework that directs them towards locations where their infrastructure requirements can be accommodated and their wider benefits maximised. GLE3 broadly provides the right foundation for this balanced approach, and we acknowledge the criteria for considering utilities impact, clustering opportunities, land and infrastructure requirements, and the potential for innovative uses of waste heat and water. We would further call for greater alignment between the utility and infrastructural needs of data centres and London's approach to a potential future devolved energy, water and waste management system.

Overall, Centre for London supports GLE3 as a necessary and broadly well-balanced policy. London should welcome data centre investment because digital infrastructure is vital to its economy and global competitiveness. However, we do not consider data centres to be so strategically significant for London that they should receive an automatic claim on scarce industrial land, electricity or water capacity simply because they are nationally important infrastructure. The approved policy should establish a managed presumption in favour of development in strategically suitable locations, supported by a transparent assessment of cumulative utility demand, land-use opportunity costs, credible heat recovery and proportionate local benefits. This approach would bridge the present divide by enabling data centres where London can accommodate them responsibly, while protecting the housing, businesses, infrastructure and communities that depend on the same finite resources.

GLE4 Night-time economy

London is a thriving night-time destination and Centre for London strongly supports the GLE4 policy's recognition that the night-time economy is both vital for economic growth and the city's cultural and public life. We recognise that the proposed policy actively calls on boroughs to plan positively for night-time economic growth, support and protect valued venues, and apply new Agent of Change principles around sensitive developments. We also welcome the progress in GLE4 which responds to our recommendation for greater protections for night-time clusters in denser nightlife centres.

However, the success of the night-time economy should not be measured only through business numbers in nightlife centres, visitor spending or the quantity of licensed premises. As discussed in our 2025 Arts for All report, there are significant inequalities in cultural participation between Londoners and across the city. Polling undertaken for the research found that 46% of Londoners identified cost as the largest barrier to arts and cultural engagement, while participation differed between occupational groups. Location, date and time also affected whether people attended cultural events. Therefore, GLE4 should support a night-time economy which is also affordable, accessible and relevant to London's different communities.

It is therefore important that GLE4 more actively supports the protection and expansion of night-time economy venues outside Central London. The classification of town centres by their night-time significance provides a useful spatial basis for planning, but GLE4 should more actively encourage boroughs to adopt night-time economy strategies and identify areas where unmet local demand, vacant premises and accessible transport could support new evening uses.

As a positive step to protecting and supporting the night-time economy, the draft Plan's support for Cultural Enterprise Zones, the Agent of Change principle, Assets of Community Value, continuity of use and rights of first refusal for established operators is very welcome. As discussed in our report on London's Social Clubs, the protections described should apply in practice to grassroots music and performance venues, pubs, social clubs, studios and other spaces whose value may be cultural or social as well as financial. Where redevelopment or regeneration is proposed, any replacement space should be suitable and financially sustainable for the intended operator, rather than simply equivalent in area.

We apply this same position to our views on the proposed Agent of Change principle. It is vital that town centres can be viable spaces for the delivery of new homes, particularly where housing would actively support a more thriving local economy or sector. However, we argue that residential intensification should not result in established venues facing retrospective restrictions on noise, servicing or operating hours. This includes community social clubs with well-grounded cultural roots in operating. Therefore, for GLE4 to be effective at this level, the policy should ensure that it has both effective planning guidance for workable coexistence between residences and night-time uses, as well as a clear regulatory framework for maintaining the balance effectively.

It is from this perspective that Centre for London identifies the most significant weakness in GLE4 and the wider planning policies for growing London's economy. The policy rightly promotes the spatial growth and protection of the night-time economy but does so without adequately integrating the licensing framework through which that activity must operate. This is a significant omission. While the Plan's supporting text acknowledges and recognises the need for interaction between planning and licensing, GLE4 does not translate this interaction into a sufficiently clear or operative requirement for either regulatory regime. Planning and licensing are legally distinct regimes, but they regulate the same premises, uses, employment bases and local impacts. A night-time venue may secure planning permission and complete its development, whether new build or minor adjustment to its fabric, yet remain unable to operate at the hours or under the conditions required to sustain a viable business. Unless the two systems are aligned, the Plan risks allocating and supporting night-time uses purely in principle while allowing inconsistent regulatory decisions to frustrate their delivery in practice.

This weakness is particularly difficult to justify following the introduction of a London Strategic Licensing Policy. This new policy establishes a mayoral framework under which licensing decisions should be evidence-led, proportionate and reasonable while supporting economic growth, socialising and culture, and recognising the safety and health benefits of well-managed night-time activity. Centre for London supports this introduction and the ability for the Mayor of London to have a more strategic oversight of decisions made. GLE4 should explicitly incorporate the new strategy's principles and require local planning and licensing policies to demonstrate how they will be applied consistently in designated night-time economy locations. Without this connection, the new London Plan and the new strategic licensing framework risk pursuing the same objectives through parallel systems which do not reliably support one another.

Where the London Plan identifies a location for night-time economic growth, applicants, operators and communities should have reasonable certainty that planning and licensing authorities are working from a shared understanding of the area's intended role, operating environment and acceptable impacts. Our response is not seeking to undermine the purposes of two regulatory systems. But to create a much more joined-up system, GLE4 should require coordinated evidence, early joint engagement and clear alignment between local plans, night-time economy strategies and borough statements of licensing policy.

The proposed regeneration of Oxford Street shows the consequences of failing to secure this integration. Centre for London supported the establishment of a mayoral Development Corporation because successful regeneration requires strategic stewardship across planning, transport, public services, public realm and commercial management. Our response also argued that licensing should form part of this coordinated framework. It was therefore, in our view, a significant weakness that the Oxford Street Development Corporation was not given licensing powers as it leaves the governance structure without a central delivery tool for implementing the wider economic vision for the area.

GLE4 should seek to avoid reproducing this institutional gap across London's night-time economy centres. At a minimum, the policy should require formal coordination between planning and licensing authorities in locations identified for night-time growth, with consistent policy objectives and a process for resolving potential conflicts before premises are developed or occupied. Where future development corporations or other strategic delivery bodies are established to oversee major night-time and cultural districts, the case for integrating licensing functions should be considered from the outset.

Overall, Centre for London supports GLE4's protection and promotion of the night-time economy, its broad recognition of night-time workers and activities, and its application of the Agent of Change principle. However, without the proposed changes to licensing, GLE4 may protect and promote the night-time economy on the planning map while leaving its practical operation vulnerable to fragmented decision-making. The result would be avoidable uncertainty for investment, greater potential for conflict with communities, and a risk that permitted venues cannot operate on viable terms. The final Plan should close this gap by treating planning and licensing alignment as a core condition of delivering its night-time economy ambitions, not as a matter to be addressed separately after development has taken place. London needs a night-time economy which protects established venues, enables new economic activity and supports a globally significant and competitive destination while remaining affordable and beneficial to Londoners themselves.

GLE5 Culture and creative industries

London's cultural venues, facilities and industrial production spaces are an essential component of the city's economy, and Centre for London supports the direction of GLE5 in its approach to protecting them and supporting their development. The development of creative clusters, new facilities and safeguarded Creative Enterprise Zones is a positive policy which will ensure that cultural activities in audience-facing and less visible spaces can flourish. Centre for London welcomes the policy's integration of arts and culture fully into the city's economic vision – which we have previously called for in our 2025 Arts for All report.

Protecting London's position as a global cultural capital should also ensure that the city can provide equitable access to its cultural offer. Centre for London's research found significant geographical and socioeconomic differences in cultural participation. Nearly a third of Londoners

identified practical barriers such as price, location and convenience among the most critical issues to address in widening participation, while cost is considered the largest barrier for 46% of Londoners. GLE5 should therefore define success as a planning policy not only through the amount of cultural floorspace protected or created, but through whether the facilities it creates are affordable, accessible and responsive to the communities around them.

In this context, the policy's support for locally distinct cultural clusters and town centre renewal is welcome. Our Arts for All report called for an end to the assumption that London's cultural activity must be intensely focused in Central London. Cultural provision outside established clusters in the CAZ reduces barriers associated with travel, time and cost, while strengthening local economies and enabling residents to participate in cultural life closer to their homes. GLE5 should therefore make a more active case for supporting a more distributed cultural economy across Outer London's town centres and neighbourhoods, as well as continuing protections for London's globally significant institutions in the CAZ.

This should include stronger support for locally rooted and grassroots organisations. Centre for London's research found that smaller organisations are particularly important in reaching people who are otherwise marginalised from cultural participation. This further relates to our response to GLE4 where research on London's Social Clubs finds that new development should make every effort to ensure cultural venues are protected or redeveloped to the same quality and size. In carrying this out, major institutions and public bodies should act as enablers of these organisations rather than displacing or attempting to replicate their activity. Therefore, while GLE5 does make clear provision for the support of creative clusters and their development for small businesses and enterprises, the final policy should further emphasise the importance of these occupiers in boosting economic growth and cultural life.

It is therefore concerning that GLE5 is significantly weakened in its policy towards the loss and re-provision of cultural space. The draft policy establishes an uncertain definition of where re-provision should be considered: either through a requirement of replacement where development leads to an unavoidable loss, or where management provisions require at least an equivalent-sized space with similar affordability. These have two different weights and would be interpreted differently in the event of a planning application. Equivalent floorspace, as evidenced in early policy responses, is not a sufficient measurement for replacing premises. Equivalence should also consider the replacement premises' building layout, fabric, infrastructure and lease in addition to operational suitability.

Equally, continuity of operation matters significantly for cultural venues like social clubs and community groups. The length of time for new development to be delivered varies significantly by its building class and economic value. In practice, this may lead to a promised facility failing to open alongside the main element of the scheme, risking the operator losing its audience, staff and local relationships. The draft policy's supporting text recognises this importance, but it remains absent from the main text. As such, and as discussed in our London's Social Clubs report, the principle of continuity of operation should be considered a much more strenuous condition on development.

More widely, Centre for London supports the inclusion of a dedicated meanwhile use policy. As found from our Local Authority Assets report and Remixing Central London, meanwhile use supports commercial, cultural or service activity during lengthy development programmes, and GLE5 is right to prioritise cultural and creative uses as temporary occupation of vacant land and buildings. However, a positive approach to flexible meanwhile use should not be presented as a substitute for secure, long-term cultural infrastructure. Short leases and uncertain occupation can

prevent organisations from investing in premises, developing staff or building sustained community relationships. Temporary activity should therefore complement permanent provision and, where successful, provide a pathway towards more secure occupation, including where affordable space is marketed and available.

In summary, Centre for London supports GLE5 and its purpose in the London Plan. The protection of cultural clusters, Creative Enterprise Zones, production space and meanwhile uses reflects the economic and social importance of London's cultural sector. However, the final policy must be strengthened so that protection of premises is judged by the continued operation and accessibility of cultural activity, not simply the retention of a use class or quantity of floorspace. Replacement space must be operationally suitable, affordable and available without damaging breaks in continuity. Planning for cultural uses must also extend beyond established Central London spaces and designated zones to support grassroots organisations and neighbourhood cultural activity across the city.

GLE6 Visitor infrastructure

Centre for London supports the direction of GLE6 and its recognition that visitor infrastructure is essential to London's continued success as a global destination. The policy appropriately supports visitor accommodation in the CAZ, town centres and high streets, while directing development elsewhere towards locations with strong public transport connectivity. It is welcome that there is also a clear strategic approach to prevent the intensification of visitor accommodation from reducing housing supply, strategic employment space or local amenities.

It is welcome that the draft London Plan has developed sensibly from the position set out in the Towards a new London Plan consultation, where Centre for London called for the Plan to review its restrictive approach to purpose-built visitor accommodation. We also argued that the growth of London's commercial development and infrastructure sectors would require additional accommodation to ensure an adequate supply. The final Plan should retain this balance and implement a more flexible but conditional planning environment for purpose-built visitor accommodation.

As a condition on development, a more relaxed approach to visitor accommodation should not constitute a general presumption that every hotel development produces an equivalent strategic or employment benefit. Planning proposals depend on a scheme's location, accessibility, relationship with local businesses and attractions, and its opportunity cost for housing and employment space. GLE6 is right to support accommodation in the CAZ and other well-connected town centres, but boroughs must demonstrate that proposals respond to evidence of visitor demand and strengthen the function of the place in which they are located.

In this instance, the policy's support for visitor accommodation beyond Central London is also welcome. A more distributed visitor economy could increase footfall and spending in other town centres outside the centre, support local cultural facilities and widen access to parts of London that receive fewer visitors. This should not, however, be reduced to encouraging hotel development wherever land is available. Proposals should form part of a wider place strategy connecting accommodation with culture, retail, hospitality, public amenities and transport.

Centre for London's Oxford Street Pedestrianisation consultation illustrates this principle most clearly. We have long supported pedestrianisation and regeneration of Oxford Street because of the potential to strengthen an important centre of commerce, culture and tourism, but have argued that success would depend on public transport access, effective governance and equitable, long-

lasting improvements to the wider place. Visitor accommodation should similarly be assessed as one component of a functioning destination, rather than as a stand-alone investment product.

Centre for London also welcomes GLE6's requirement that intensification of visitor accommodation must not negatively affect housing supply or strategic employment capacity. London's housing crisis and constrained supply of employment premises mean that the opportunity cost of visitor accommodation must be assessed explicitly, especially where new hotels compete for sites which are also viable for market and affordable housing or new workspace. As per our research on London's housing crisis in *Delivering the Homes London Needs*, there is a substantial pressure on local authorities to provide temporary accommodation to house homeless households. As per monitoring by London Councils, more than 102,000 children are living in temporary accommodation in the capital, costing the boroughs £5m every day. It is therefore essential that the new London Plan does not create incentives which makes borough access to emergency accommodation more difficult. But neither should planning policy be relied upon as a substitute for a dedicated temporary accommodation strategy.

GLE6 provides a sound spatial framework for visitor accommodation, but the current proposed policy does not establish a clear framework for how boroughs and the GLA will determine if the overall mix and location of visitor accommodation is appropriate. Because visitor demand and local property markets change, it is important that the policy include provisions for the periodic review of market evidence rather than relying primarily on a fixed assessment of planning applications made when Local Plans are adopted.

GLE6's more positive and spatially flexible approach to visitor infrastructure is a welcome development and Centre for London supports its direction. London requires sufficient accommodation to sustain its global visitor economy, support cultural institutions and spread economic benefit across well-connected centres. The policy is also right to protect housing and employment capacity, but the policy will only be effective if supported by robust monitoring, clearer assessment of competing land uses and coordination between visitor development, housing, culture and local place strategies. Without safeguards, the policy risks expanding visitor accommodation without sufficient control over where its benefits accrue or what essential land uses it displaces.

GLE7 Affordable workspace

Centre for London supports the objective of GLE7. Affordable workspace is essential to a diverse and competitive economy, enabling smaller businesses, start-ups, cultural organisations and social enterprises to establish themselves and remain in parts of London where market rents would otherwise exclude them. Centre for London's *Towards a new London Plan* consultation response highlighted the role that flexible and comparatively affordable premises have played in supporting SME growth in West London and emerging innovation clusters. As found further by our research on the sub-regional economy in East London, affordable workspace is essential for start-up businesses to grow and integrate into local supply chains.

In several respects, GLE7 is a stronger and more comprehensive policy than its predecessor in the current London Plan. Where the current policy permits obligations to be used in defined circumstances and asks boroughs to consider the application of detailed policies justified by need and viability, the proposed GLE7 creates clearer expectations for local provision. It is also welcome that this expectation adds additional detail on the scale of development, 'trigger point' for provision on-site, and circumstances of affordability, viability and delivery. The proposed policy

also adds further detail on the broad range of relevant development and adds genuinely useful guidance on the requirements for replacement of existing affordable workspace.

However, Centre for London considers the proposed policy to be strategically weaker without a more consistent London-wide policy with greater clarity on minimum lease durations, method for calculating affordability, approach to occupancy costs, or clear strategic test for measuring when off-site provision and payment in-lieu is acceptable. This is disappointing as the Towards a new London Plan consultation explicitly identified inconsistency between boroughs and considered that a shared definition could be created to guide understanding on development thresholds for delivery, duration of tenure and any rental discounts. Sadly, GLE7 does not resolve this problem and effectively formalises the existing fragmentation by delegating definition to local authorities.

Centre for London recognises the viability challenge and that requirement for a single London-wide floorspace requirement or uniform rental discount would not adequately reflect local land and development values. We recognise that local flexibility is necessary because commercial markets, development values and occupier needs differ across London. New commercial and industrial floorspace is expensive to deliver, particularly where modern environmental and technical standards increase construction costs. As our forthcoming research into London as a HQ City identifies, the need to deliver high-quality office developments viably demonstrates London's global competitiveness. And where affordable workspace requirements are generally borne upfront by development, these excessive or poorly calibrated obligations may prevent schemes from proceeding at all.

However, flexibility should operate within a common strategic framework, and viability is not a fully sufficient justification for removing strategic standards. While not reflective of commercial or industrial development, our evidence from Delivering the Homes London Needs on the planning system shows that uncertainty and a lack of clear principles can weaken viability and create development risk. As such, it is essential that, in the absence of a London-wide quota or more specific requirement, the London Plan establishes a set of clear principles which are tested through Local Plan-making and visible to developers before land is acquired and schemes are designed.

Without shared principles, comparable developments across planning authority boundaries may face materially different obligations across borough boundaries, while affordable workspace may describe premises with very different costs, security and usefulness to occupiers. It is therefore notable that GLE7 removes the existing benchmark in supporting text on duration of discount and occupancy. Where the current policy allows affordable workspace to be secured in perpetuity or for a 15-year minimum term, the proposed GLE7 policy relaxes this to allow boroughs to be more prescriptive in setting a duration of term without an equivalent London-wide minimum. This increases flexibility but it risks allowing affordable workspace provision to be secured for periods which are too short for business occupiers to have a sustained impact, grow their community relationships, or attract investment.

In this regard, where on-site provision is provided as an unwelcome necessity rather than a positive policy to support an inclusive economy, the grounds for a more flexible policy on off-site provision and financial contributions requires stronger safeguards. As researched in our Remixing Central London report, the provision of affordable workspace and meanwhile use premises can generate real social value and contribute to the local economy. It is therefore important to ensure that off-site provision is accepted where it demonstrates a better and timely outcome within the same economy, rather than being fragmented within individual developments outside the occupiers' relevant area of business activity.

The lack of shared London-wide principles for meaningful London-wide provision leaves affordable workspace highly volatile to market forces and more reliant on borough-led delivery via financial contributions. The delivery of affordable workspace via Section 106 negotiations also becomes strategically weakened by the lack of a shared operating framework, while also being effectively undermined by baked-in low viability. As such, the final policy as adopted must establish a shared set of common principles which retains the ability to design flexibly to local markets, without compromising the ability for affordable workspace to be delivered and occupied by the businesses and organisations it supports.

Centre for London welcomes GLE7's considerably stronger requirement to replace existing affordable workspace with at least an equivalent amount at the same or an enhanced level of affordability. This ensures that affordable workspace remains an important part of commercial land development, while supporting smaller businesses to grow and thrive. However, where equivalence is defined, it should also consider the operational suitability, location and total occupancy costs as well as total replacement floorspace. Reprovision of space is ineffective if the existing businesses cannot afford to return or if the new premises lack the access, servicing or fit-out required by their business activities.

Centre for London supports the strengthened structure and broader scope of GLE7 but considers that the policy remains incomplete. It does not remove affordable workspace provision relative to the current policy in its entirety, but it fails to deliver the London-wide consistency anticipated during preparation of the Plan and appears to remove the minimum term benchmark which underpins the success and certainty which can support small businesses to grow. Flexibility and viability are important aspects of development to consider, and establishing a common strategic framework beneath borough policies would not undermine these concerns. Without shared principles, the GLE7 policy will be a stronger procedural framework than its predecessor but will fail strategically to ensure that provision is consistent, accessible and, crucially, durable to the needs of growing enterprises.

GLE8 Access to employment and skills

Centre for London strongly supports GLE8's objective for using new development to improve access to employment, apprenticeships, vocational training and skills programmes. The policy correctly recognises that new development should generate opportunities beyond the building itself, during both construction and the completed use of a building where relevant. The proposed policy's key focus on people who are out of work, under-employed or under-represented in relevant sectors is consistent with Centre for London's definition of promoting an inclusive economy.

This policy is especially important under the current policy circumstances of youth unemployment, inactivity and limited access to the labour market. Centre for London's 2026 Held Back report highlighted that London's employment rate for 16-24 year-olds fell from 45.6% in 2019 to 41.3% in 2025, leaving it more than ten percentage points below the England average of 51.5%. The report found that educational attainment is not the primary cause for poor employment outcomes, but that the transitions from education to work or apprenticeships are not sustained or sufficient in size or access to support youth employment.

Centre for London therefore supports the GLE8 policy's requirement to cover both construction and completed-use employment, rather than concentrating only on temporary jobs generated while a development is built, to directly support employment outcomes. However, in its current form, the policy does not sufficiently focus on whether the employment and skills opportunities

provided lead to a completed training programme or sustained, good-quality employment. The creation and take-up of these opportunities are important aspects of development to monitor, but they are not a fair assessment of whether the scheme has delivered a successful outcome. As such, where GLE8 requires development monitoring to measure new starts and completions, it should also seek to measure how these opportunities are sustained, where qualifications have been earned, and how they progress into sustained work.

London's construction sector illustrates the depth of this employment challenge. Despite significant workforce shortages and London's need to deliver new homes, infrastructure and retrofit of housing and commercial buildings, the capital recorded only one apprenticeship start for every 32 construction businesses in the period analysed in Held Back. This represents a failure to translate employer demand, development investment and educational attainment into accessible entry routes. GLE8 should respond more directly to this mismatch by demonstrating how proposed employment and skills opportunities transfer sufficiently into sustained work. Short placements and introductory training can provide value but should not be treated as equivalent to completed apprenticeships, recognised qualifications or sustained employment.

The policy's support for reciprocal apprenticeship arrangements between boroughs is welcome and highly beneficial for development. Construction projects should ensure that, when complete, apprentices can move between sites to complete their training. Restricting opportunities too narrowly to residents of a single borough fragments both the development and training pipeline and leave apprentices without sufficient work to finish their qualifications. Cross-borough arrangements should therefore become an expected feature of major multi-phase developments rather than remaining principally encouraged. This policy should, however, be less prescriptive to voluntary cross-borough arrangements and part of a more coordinated London-wide and sub-regional skills system. Centre for London's work with Local London supports an employer-aligned skills offer connecting boroughs, businesses, education providers and employment services, where sub-regional partnerships can coordinate the development of reciprocal apprenticeship arrangements.

Overall, Centre for London supports GLE8 and its direction, but the policy should move from simply counting the number of opportunities created to measuring their transitions and employment and training outcomes. Its effectiveness should be judged by whether participants complete training, enter sustained employment, progress into better work and gain access to sectors where London has identified workforce needs. Without stronger tests for this policy, development may generate substantial volumes of activity without materially improving access to London's labour market.

GLE9 Aviation

Centre for London supports the balanced principles underpinning GLE9. London's airports are essential to the capital's international connectivity, visitor economy, trade and competitiveness as a global city. The policy is right to support the six main airports operating as a single aviation system and making better use of the existing capacity, provided that growth clearly supports local employment and is accompanied by improved and sustainable surface access with measures to reduce private car use.

The policy's principles are particularly relevant for the development and economic value of Heathrow Airport. As found in our 2024 London and the Heathrow Region report, the airport and its surrounding area are a critical economic hub for London, the South East and wider UK whose development is felt beyond simple borough geographies. There is also an existing shared interest

with the GLA, boroughs, Heathrow Airport itself and transport providers in improving access while reducing private car journeys, including through better integration of bus and other public transport services. Centre for London therefore supports investment that improves Heathrow's existing operations, passenger and freight connectivity, environmental performance and relationship with the surrounding economy. Capacity should be used more efficiently where this can be achieved without unacceptable effects on communities, transport networks or the environment. This development should also strengthen employment, skills and supply-chain opportunities in West London and the wider Heathrow region rather than treating the airport as an isolated national asset.

However, this conditional support for the airport's existing development should not be interpreted as support for a third runway. Centre for London has consistently called for its development to be grounded in independent evidence of its impact. The scale and permanence of the proposal justify a materially higher environmental, transport, economic and governance test than improvements to the existing airport. We therefore support the GLE9 proposed position which calls for well-grounded, independent analysis on whether expansion will lead to unacceptable environmental, transport and congestion impacts before any major planning decision is made. These safeguards are vital to ensure that any proposed expansion is sustainable, economically significant and does not negatively impact the connectivity or quality of life for local communities.

We consider expansion's biggest challenge to be the potential impact on surface access and transport connectivity. The GLA's evidence on aviation rightly identifies that the prospect of further public transport crowding, congestion on local highways, lack of access by active transport networks, and requirement for additional parking and freight access will constrain London's transport network in West London. Centre for London also accepts this evidence and as evidenced in London and the Heathrow Region, notes that any expansion would also impact transport access and connectivity to the wider West London sub-region and local authorities outside London.

The prospective expansion of Heathrow also illustrates the need for stronger cross-boundary governance in such a significant economic hub. Centre for London's previous response to Towards a new London Plan argued that economic and transport corridors crossing London's boundary require closer cooperation between the GLA and authorities in the wider South East. Any airport expansion therefore requires a more formal governance structure bringing together the Mayor, TfL, affected boroughs, neighbouring authorities, transport providers, environmental bodies and local communities.

On the development of existing airport infrastructure and assets, Centre for London supports the GLE9 qualified approach to aviation and its requirements to make efficient use of existing capacity. Heathrow Airport is a vital piece of the UK's economic infrastructure and its positive impact on local prosperity, employment and services should be strongly supported. However, this existing role should also be boosted by better surface access, stronger cross-boundary coordination and closer integration with West London's economic strategy.

On the proposal for a third runway at Heathrow, Centre for London considers it to be a wholly different order of decision. We remain sceptical that the required environmental, surface-access, and inclusive economic growth conditions have yet been demonstrated to make an unqualified case for expansion possible. GLE9 should therefore retain a clear presumption against expansion unless a proposal can meet those conditions transparently, cumulatively and at no disproportionate cost to London's residents or transport system.

GLE10 Safeguarded wharves

Centre for London does not make a substantive representation on this policy.

GLE11 Circular economy

Centre for London does not make a substantive representation on this policy.

GLE12 Waste

Centre for London does not make a substantive representation on this policy.

GLE13 Aggregates and mineral resources

Centre for London does not make a substantive representation on this policy.

Creating a greener, healthier, and resilient city

GHR1 Energy-efficiency

Centre for London strongly supports GHR1's emphasis on reducing building energy demand, lowering occupier bills and ensuring that buildings perform efficiently in practice. The shift in focus towards absolute energy use and space-heating demand standards provides a clearer basis for measuring performance than reliance on improvements against modelled Building Regulations baselines. The requirement for major developments to monitor and report in-use energy demand for at least five years is also welcome to ensure that newly constructed sites are performing optimally against their approved building designs.

We also consider the creation of London-wide, consistent energy standards, rather than borough requirements, to be a significant improvement and move towards a clearer energy system for the city. Maintaining energy performance against a more strategic baseline should more clearly connect with London's energy infrastructure planning to help limit pressure on energy systems. The proposed policy should be implemented in close connection with MBUL4 to ensure that energy network operators, the GLA, boroughs and developers are connected to a system of effective governance. Centre for London has openly recommended giving the Mayor a statutory duty to coordinate London's energy infrastructure, resilience, grid readiness and decarbonisation policies, and GHR1 should form part of this.

While the proposed policy focuses on new development, there is a limitation in that the city's biggest energy efficiency challenge is in existing buildings. As per our response to Towards a new London Plan, we consider it vital that the Mayor of London have additional resources and powers to deliver retrofit programmes, particularly for social housing or in encouragement and regulation for improvements in the private rented sector. This limitation will not be resolved through planning policy alone. GHR1 should therefore be accompanied by a commitment through Warmer Homes London to explore the benefits and efficiencies of a London-wide retrofit delivery approach which builds on its existing programme to deliver consistent funding, skills, borough capacity and coordination across different building types. Without this level of strategic governance, the Plan may secure higher standards in new buildings and make little to no progress across the much larger stock of homes and commercial buildings that already exist.

Centre for London supports GHR1 and its approach to absolute performance standards, as well as its focus on reducing demand and requirements for post-completion monitoring. These represent a strong direction of travel for a more formalised regionally devolved responsibility for utilities management and control. But the final policy should retain this ambition while linking its energy

efficiency requirements more clearly to energy systems management, while recognising that the largest gains depend on a funded and coordinated programme of retrofit for existing buildings.

GHR2 Low-cost low-carbon heat

Centre for London does not make a substantive representation on this policy.

GHR3 Whole life-cycle carbon

Centre for London does not make a substantive representation on this policy.

GHR4 Heat risk

Centre for London does not make a substantive representation on this policy.

GHR5 Flood risk and drainage

Centre for London does not make a substantive representation on this policy.

GHR6 Trees, biodiversity and geodiversity

Centre for London does not make a substantive representation on this policy.

GHR7 Green Infrastructure and Urban Greening Factor

Centre for London does not make a substantive representation on this policy.

GHR8 Accessible green space

Centre for London does not make a substantive representation on this policy.

GHR9 Clean and healthy waterways

Centre for London does not make a substantive representation on this policy.

GHR10 Air quality

Centre for London does not make a substantive representation on this policy.

GHR11 Cycle and car parking

Centre for London strongly supports the objective and principles of GHR11 in facilitating more cycling and active travel, reducing dependence on private cars, and making more efficient use of brownfield land. It is particularly encouraging to see this version of the London Plan place car-free and car-lite development as a central objective, and we consider this draft policy to be appropriate to wider proposals in the draft Plan.

The main challenge arising from this policy concerns the extension of car-free and car-lite development into less-connected parts of Outer London. Centre for London supports the objective, but there must be viable alternatives for travel to ensure parking restraints are not unfairly imposed. The policy must be matched by reliable bus services, safe walking and cycling routes, shared mobility options and improved access to employment and essential services. Our Moving with the Times report investigated Outer London's transport connectivity and found that with less active-travel infrastructure, there is a clear need for a more bespoke Outer London Transport Strategy reflecting the area's distinct travel patterns and connectivity needs. Our

Platform for Growth report in partnership with Transport for London also raises the significant need to ensure Outer London's bus services and connectivity is both protected and maintained.

Car-free and car-lite developments must have public legitimacy. Polling detailed in our response to Towards a new London Plan showed that opinion on parking-free development is relatively divided, with Outer Londoners less supportive than Inner Londoners. This demonstrates that parking restraints must be introduced alongside a visible increase in service by public transport, greater access to active travel networks, and ensured connections to the area's economic centres. Car-free development must also remain operationally workable for residents and logistics services. Our Active Last Mile research report argues that residential and commercial developments require protected space for deliveries, servicing and loading, particularly in high-density schemes. GHR11 should therefore be applied alongside clear servicing strategies and support for urban logistics hubs, cargo-bike distribution and deliveries. Reducing residential car parking should not simply displace freight and servicing activity onto pavements, cycle lanes or surrounding streets at the risk of access issues, increasing road constraints and congestion.

Equality assessment for car-free or car-lite should be explicit and central to the development proposal. Car-free developments must demonstrate how they provide for disabled residents and visitors, taxis, carers, deliveries and people who cannot reasonably make all journeys by public or active transport. Furthermore, any new cycle and micromobility infrastructure delivered must also avoid obstructing pavements or creating barriers for people with visual or mobility impairments. Centre for London has previously recommended Equality Impact Assessments for car-free development and new micromobility infrastructure.

The GHR11 policy is the correct strategic direction for active travel and car parking policy. Its prioritisation of active travel, car parking limitation, and protection of disabled parking bays are appropriate principles to underpin the policy. The success of this policy will depend on how it is implemented in developments. Parking restraint should be closely coordinated and backed by improved public transport services, particularly buses in Outer London, while cycle parking must remain accessible and functional. Car-free development must also make adequate provision for accessibility, servicing and deliveries.

Place visions and place-based approaches

PV1 Brownfield First Opportunity Areas

Centre for London strongly supports PV1's focus on strategic brownfield locations where housing, employment, transport and infrastructure must be planned closely together. This reflects our longstanding support for prioritising previously developed land and accelerating suitable development in well-connected locations.

However, designation must not be mistaken for the challenges which accompany any delivery on-site. Many Brownfield First Opportunity Areas sit in areas which are constrained by fragmented ownership, infrastructure deficits, potential site contamination, poor utility capacity, weak viability and residual industrial footprint. Local Plan designation and Opportunity Area Planning Frameworks will not be sufficient in the most complex locations, particularly for new housing schemes.

The final Plan should require each development on BFOAs to have clear delivery information covering infrastructure sequencing, land assembly, funding, affordable housing if relevant, and accountable leadership. As per our longstanding area of advocacy, where established mechanisms in the planning system are failing to unlock development, the Mayor and boroughs should consider

stronger strategic delivery vehicles, including development corporations with the powers and long-term funding needed to coordinate delivery. Centre for London continues to advocate for the establishment of development corporations for new major mixed-use sites around transport hubs.

We welcome this improved spatial vision for some of the most complex sites in London. However, we consider it important that the delivery of these sites should not be solely about the designated capacity on site but how it is coordinated, completed and backed by vital infrastructure to ensure these areas can thrive for years to come.

PV2 Central Activities Zone

London's Central Activities Zone is one of the world's most important economic, cultural and business centres. Centre for London welcomes the continued protection of the district and considers the enhancement framework set out through greater distinction of land use to be appropriate and encouraging for the district's future.

As we argued in our Remixing Central London report, the CAZ is more than just a narrow, office-dominated model. The adaptability of sites through flexible, mixed-use renewal is crucial to enable the vibrancy of strategic commercial areas. We acknowledge the draft policy's preference to prioritise workspace, cultural venues, visitor infrastructure and other commercial uses over housing in the district. While housing contributes positively to a more active and economically resilient town centre, there is a risk that new housing could displace these essential functions. This was discussed in our response to the Oxford Street pedestrianisation consultation in relation to the future development of the area.

Where the CAZ succeeds, is in its ability to agglomerate highly productive commercial sectors and businesses with co-located functions. As written in our forthcoming London as a HQ City report, this co-location is vital for the city's office sector to be genuinely competitive as a global investment hub. As such, PV2 should define competitiveness more broadly and consider wider aspects of development such as public realm access, transport links, servicing and affordable workspace. This would upgrade the policy to ensure a greater level of stewardship, which our Oxford Street pedestrianisation response also considered vital as a coordinated purpose.

PV2 is a stronger and clearer place vision for the CAZ, and Centre for London strongly supports its implementation. We would welcome further improvement to the policy through an upgraded definition of local competitiveness.

PV3 Town centres and high streets

Centre for London strongly supports PV3's ambition for town centres and high streets to accommodate a diverse mix of housing, commercial activity, culture, community facilities and social infrastructure. Greater flexibility and appropriate intensification in well-connected centres can increase housing supply, attract investment and support a more polycentric London economy. This was also considered in our response to the Towards a new London Plan consultation.

Centre for London's high-streets research demonstrates that successful centres are not simply concentrations of retail. Community Town Centres called for inclusive town-centre strategies shaped with local communities and stronger powers to bring long-term vacant commercial premises back into use. Our work on High Streets and Placemaking in the Royal Borough of Kensington and Chelsea similarly recommended bespoke action plans reflecting the distinct functions, users and physical conditions of individual high streets.

PV3 should therefore require intensification to strengthen the existing economic and civic role of each centre. Uncontrolled conversion of commercial premises can remove affordable workspace, services and community assets, while delivering housing poorly suited to its surroundings. Boroughs should identify genuinely surplus space through local evidence and protect premises that remain important to local businesses and communities. This clearly relates to our responses to Growing London's Economy policies earlier in the draft Plan.

Successful intensification also requires active stewardship. Centre for London's research on Reducing Street Clutter in Central London emphasised that high streets should be clean, safe, well-lit, accessible and easy to navigate. Cluttered or poorly maintained streets undermine accessibility, discourage footfall and weaken local vitality. Meanwhile use can help reactivate vacant premises, but it should support a long-term place strategy rather than substitute for one, as we referenced in our earlier responses.

Centre for London supports the flexible and growth-oriented approach which PV3 presents. To transform it further, the final policy should ensure that new housing and commercial development form part of locally specific, community-informed strategies that protect valuable uses, improve public space and strengthen town centres as economic and civic places.

PV4 Strategic economic clusters and corridors

The Towards a new London Plan signposted to a revitalised policy for economic cluster development, which Centre for London supported as an essential boost for growth, local prosperity and competitiveness. It is encouraging to see this has now transformed into a positive vision towards greater polycentric economic growth across the city, and we strongly support the policy's recognition of the power of boosting distinct, interdependent economic centres in London.

As discussed in our West London's Growth Potential report, successful polycentric economies depend on dense transport networks, particularly orbital connections that link economic centres rather than principally channelling activity towards the centre. The research also found that a diversified economic geography can improve resilience and distribute growth across a wider population. It is therefore encouraging to see this policy also recognise the importance of orbital transport, as well as the various infrastructure projects which would boost growth, including the West London Orbital, Bakerloo line extension, and Crossrail 2.

The challenge for this policy in implementation is ensuring that planning policy and land use designation can be clearly linked to the additional governance, infrastructure or economic planning needed to stimulate investment. As per our recommendations from Rebooting London's Economy, economic clusters should be guided by principles of stewardship which identify the conditions needed for its growth, including workspace needs, skills, sector-specific infrastructure, and investment. PV4 would be considerably more impactful if, as a planning policy, it encouraged landowners and developers to recognise these conditions and integrate them into their plans.

PV5 Industrial land supporting housing growth

Centre for London supports PV5 only as a tightly controlled, plan-led exception to the protection of industrial land established under GLE2. Release should occur only where industrial capacity is no longer required or has been replaced within the relevant property market area. Replacement must be functionally equivalent, and housing should be designed so that retained industrial activities can continue operating without subsequent restriction or displacement.

PV6 Metropolitan Open Land

The continued protection of Metropolitan Open Land is welcome, and Centre for London supports the proposed method for reviewing applications for release or development through the Local Plan process. MOL provides important green open space, with important ecological, recreational and climate-resilience functions which will become more valuable as London grows and densifies.

Centre for London also supports the cautious approach towards land release except in exceptional circumstances, including the inaccessibility of land or failure to serve its intended amenity, such as golf courses and commons. Where release is proposed, any boundary change should remain plan-led and involve the Mayor, relevant boroughs and local communities. Where limited release is justified, it should secure substantial public benefit, including improved access to green space, enhancement and high-quality development.

PV6's balance between permanent protection and limited boundary review is a positive stance and Centre for London supports its intended role. The final policy should protect high-value MOL robustly while enabling a transparent review of land that no longer performs a meaningful function.

PV7 Sustainable development and enhancement of the Green Belt

PV7 is closely aligned with Centre for London's longstanding support for the selective release of low-quality and previously developed Green Belt land, particularly around transport hubs. This was evidenced in Rebooting London's Economy as well as our Towards a new London Plan consultation response. These both argued that development on released land should deliver substantial affordable housing, public transport and active-travel infrastructure, environmental enhancement and long-term stewardship.

While it is understandable as a framework for releasing land, PV7 is less strong on the principles for actual development on Green Belt land. Centre for London considers it crucial that strategic-scale urban extensions are guided by cross-boundary governance arrangements such as development corporations, as they require coordinated land assembly, infrastructure investment, and utilities. The final policy should therefore require development to have clearer infrastructure plans to ensure that any released Green Belt land is supported by adequate transport and utilities investment, as well as delivering appropriate green infrastructure and biodiversity gains.

Centre for London strongly supports PV7's change in direction, and it is encouraging that the draft Plan is making a case for qualified release of Green Belt land for development. The credibility of this policy will depend on whether the Broad Locations for Growth are treated as coordinated programmes of development, rather than simply additional land supply with disconnected communities, infrastructure and function.

PV8 Strategic and local views

Centre for London does not make a substantive representation on this policy.

Conclusion

Centre for London supports the draft Plan's more ambitious approach to housing growth, density, economic development, town centres and selective land release. It provides a clearer spatial account of how London can grow and better recognises the importance of infrastructure, economic geography and local viability.

However, ambition on the planning map will not be sufficient. The final Plan must connect its spatial strategy to funded infrastructure, accountable delivery institutions and the wider regulatory

systems governing housing, utilities, transport, licensing and skills. It should combine local flexibility with clear London-wide principles and ensure that affordable, cultural and productive uses are protected through functional rather than nominal replacement.

The Plan must also set out how delivery will be monitored to drive progress. Success should be measured through completed and affordable homes, occupied and suitable premises, sustained employment, operational infrastructure and functioning places. With stronger governance, investment and implementation arrangements, the draft Plan can provide a credible foundation for inclusive and sustainable growth across London.

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