

Draft London Plan Consultation

G15 Response to the GLA

October 2026

About the G15

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

Find out more and see our latest updates on our website: www.g15.london

The G15 members are:

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

For more information, please contact: G15@Peabody.org.uk

Executive Summary

The Draft London Plan is one of the most important opportunities to improve the conditions for housing delivery in the capital. London urgently needs more homes, particularly Social Rent and other genuinely affordable homes, and we welcome the clear focus on increasing delivery.

G15 members are particularly pleased to see the GLA respond to earlier calls from the housing sector for a more focused and streamlined London Plan. The clearer strategic framework, reduced duplication and stronger emphasis on delivery are significant changes. They demonstrate that the Mayor and GLA recognise the scale of London's housing challenge and are serious about supporting the delivery of new homes.

We support the Draft Plan's focus on increasing housing supply, making better use of brownfield land, coordinating growth with infrastructure and maintaining a strong role for social and affordable housing. We also welcome the greater recognition that planning policy needs to work in practice across different sites, housing types and delivery models.

The final Plan should provide a clear, practical framework for delivering more good quality homes and managing them successfully over the long term. For G15 members, deliverability is ultimately about resident outcomes. The decisions made through the Plan will influence how many genuinely affordable homes can be built, the costs residents face, and whether those homes remain safe, accessible, comfortable and manageable over the long term.

Housing associations have responsibility for residents' homes long after construction is complete. Decisions made at design stage and through the planning process shape how homes perform, the costs of operating and maintaining them, and residents' experience over many years. The final Plan should apply this perspective consistently, so choices about building form, materials, heating and ventilation, accessibility and shared spaces take account of long-term comfort, affordability, maintenance and management.

London cannot address its housing shortage through planning policy alone. High construction and financing costs and difficult market conditions continue to affect delivery. Housing associations are also continuing to make substantial and necessary investment in the safety, quality and energy performance of residents' homes, which affects the investment available for new development.

The final Plan therefore needs to sit alongside sufficient grant, affordable long-term finance and infrastructure investment. Its policies also need to work together as a package. High standards are important to delivering homes that are safe, comfortable, accessible and affordable to live in over the long term. The final Plan needs to secure these outcomes while ensuring that the cumulative effect of the policy package remains deliverable. This balance will not

always be straightforward. The final viability evidence should therefore assess the combined cost and practical effect of the Plan's requirements across different types of development, while also recognising the long-term benefits they provide for residents and landlords. Where genuine conflicts arise, the final Plan should focus on clearer guidance, sequencing or proportionate flexibility in how outcomes are achieved, rather than weakening the outcomes themselves.

Our priorities for the final London Plan:

- **Keep Social Rent and genuinely affordable housing central to the Plan.** Maintain a strong focus on Social Rent, family-sized homes, accessible homes and supported and specialist housing, with funding that helps schemes deliver as much genuinely affordable housing as possible.
- **Make sure the Plan works as a whole.** Test the cumulative effect of affordable housing, design, accessibility, building safety, sustainability and infrastructure requirements so that high standards and housing delivery can be achieved together.
- **Get Section 106 affordable housing working effectively.** Involve housing associations early enough in the development to influence tenure, specification, service charges and management arrangements, and align planning and investment processes more closely.
- **Design homes around residents and their long-term use.** Consider durability, maintenance, energy performance, replacement costs and service charges alongside initial development costs, so homes remain safe, comfortable and affordable to live in over time.
- **Plan and fund infrastructure alongside housing.** Give greater clarity on the timing, funding and responsibility for transport, utilities and other infrastructure, particularly on large phased developments.
- **Apply the Plan consistently across London.** Reduce unnecessary duplication, make clear where local variation is justified, and support boroughs with the capacity and specialist expertise needed to make timely and predictable decisions.

Keep Social Rent and genuinely affordable housing central to the Plan

We strongly support the priority given to Social Rent and the Mayor's ambition to increase affordable housing delivery. London needs a range of genuinely affordable homes that responds to the circumstances of Londoners, including larger family homes, accessible homes and supported and specialist housing.

The threshold approach can provide greater certainty and reduce prolonged viability negotiations where the thresholds are deliverable under prevailing market conditions. Grant and other public investment should be used alongside

it to support schemes to provide more Social Rent and other genuinely affordable homes where possible.

Estate regeneration requires particular consideration. These schemes can provide better homes for existing residents and additional affordable housing, but providers must fund replacement homes, temporary rehousing and other substantial costs before new homes are delivered. The regeneration Fast Track route needs to recognise these circumstances while protecting existing residents, their right to return and existing affordable housing.

Make sure the Plan works as a whole

Individual policies cannot be considered in isolation. Affordable housing, accessibility, building safety, energy performance, design, climate resilience and infrastructure are all important, but their combined effect determines whether a scheme can proceed.

The final viability evidence should therefore test the complete policy package across a representative range of developments, including schemes with high levels of Social Rent, estate regeneration, supported housing, constrained sites and large phased developments.

High standards and housing delivery need to be achieved together. Requirements that provide meaningful benefits for residents should be recognised alongside their costs. Where requirements add cost or complexity without a comparable benefit, the Plan should provide a proportionate route for applicants to demonstrate how the intended outcome can be achieved.

Get Section 106 affordable housing working effectively

Section 106 remains an important source of affordable housing, but homes secured through the planning system need to be capable of being acquired and managed by registered providers.

Housing associations should be involved while tenure, design, specification, service charges and management arrangements can still be influenced. Early engagement can prevent affordable homes reaching the end of the development process with costs or specifications that make them difficult for a provider to acquire or expensive for residents to live in.

We support consistent implementation of the national Section 106 engagement approach and closer alignment between the GLA's planning and investment functions. Where affordable homes cannot initially secure a provider, the reasons should be understood and reasonable changes tested before affordable housing is reduced.

Design homes around residents and their long-term use

The quality of a home cannot be judged only at completion. Housing associations remain responsible for repairs, maintenance, building systems and future improvements throughout residents' occupation.

The Plan should therefore give appropriate weight to durability, energy performance, accessibility, maintenance, replacement costs and service charges alongside initial construction cost and design quality.

Supporting guidance also needs to distinguish clearly between mandatory policy requirements and recommended best practice. This is particularly important where expectations on design, sustainability, safety and accessibility interact. Where the Plan allows flexibility, applicants should be able to demonstrate through proportionate evidence that another approach delivers the intended outcome.

Energy performance and climate resilience are an important part of this. We support the Plan's focus on reducing energy demand, improving building performance and protecting residents from overheating. Standards should support homes that are comfortable to live in, affordable to run and practical to maintain, with clear and consistent arrangements for modelling, monitoring and implementation.

Plan and fund infrastructure alongside housing

Major housing delivery depends on the transport, utilities and social infrastructure needed to support it.

This is particularly important on large developments where infrastructure provided through an early housing phase may also support later phases, neighbouring developments and existing communities. Contributions should reflect the demand created by an individual development as well as the wider benefits of strategic infrastructure.

Opportunity Areas and other strategic frameworks should make responsibilities, funding and phasing clear. Residents moving into the first homes should have access to the transport, utilities, public spaces and services they need from the outset.

Apply the Plan consistently across London

A more streamlined London Plan will only improve delivery if its implementation is equally clear.

Where the Plan establishes a London-wide strategic approach, supporting guidance should minimise unnecessary duplication and make clear when additional borough requirements are justified by local evidence. Applicants

should not have to resolve substantially the same strategic question in different ways across different boroughs.

Planning authorities also need the capacity and specialist expertise required to make timely and consistent decisions. More proportionate and predictable pre-application, design review and Planning Performance Agreement processes can reduce repeated work, late redesign and avoidable costs without weakening scrutiny.

A framework for delivery

G15 members want the new London Plan to succeed. We share the Mayor's ambition to increase housing delivery and provide many more Social Rent and genuinely affordable homes. As long-term charitable landlords, we also have a responsibility to ensure those homes remain safe, good quality and affordable to live in and manage for decades to come.

The Draft Plan represents a significant and welcome response to concerns raised by the housing sector about complexity, duplication and the practical barriers to delivery. Its more focused approach gives London a stronger basis for increasing housing supply.

The final policy package should be deliverable in combination, consistently implemented and backed by the investment required to support new homes and the infrastructure around them.

A clear and workable London Plan can give boroughs, housing associations and other delivery partners greater certainty while retaining the flexibility needed to respond to different sites and residents' needs. Most importantly, it can help London provide more of the secure, genuinely affordable and good quality homes that Londoners urgently need.

Chapter 1: Overview and Good Growth objectives

Whole-plan viability

Housing associations will be central to the delivery of the Social Rent and other affordable homes identified in the Draft Plan, while continuing to invest in the safety, quality and energy performance of residents' existing homes. The Draft Plan recognises that viability is a significant constraint on delivery and that the cumulative effect of policy requirements is important to consider. The final viability evidence should therefore make clear how the combined policy package affects different forms of development across London. This should include schemes delivering high proportions of Social Rent and other affordable housing, estate regeneration, supported housing, constrained infill sites and large phased developments. It should consider affordable housing, infrastructure, accessibility, design and environmental requirements in combination, including the cost of demonstrating compliance and monitoring performance. Any material changes to the policy package following consultation should also be reflected in the final viability evidence.

The assessment of cost also needs to reflect the consequences of design choices over the life of a home. Some requirements may increase initial development cost but reduce residents' energy bills or service charges, avoid future retrofit and replacement costs, or improve how well homes meet residents' needs. These longer-term effects should be considered alongside requirements that add cost or complexity without a comparable benefit. The viability evidence should therefore distinguish between these effects when considering the cumulative policy package. This is particularly important where changes to individual design requirements are intended to improve viability. The relevant question is whether the resulting saving is material in the context of the overall scheme appraisal and likely to affect whether homes proceed.

Investment and capacity

Housing delivery will also depend on the investment and finance available to support the London Plan. We welcome the Draft Plan's recognition that greater public-sector intervention will be needed to support delivery, including access to low-interest finance for housing associations. For housing associations, sufficient grant and access to affordable, long-term finance are central to development capacity, alongside greater flexibility in the use of funding such as the Recycled Capital Grant Fund (RCGF). The GLA's planning and investment approach should make clear how these interventions will support the delivery assumptions underpinning the Plan, including schemes with high levels of Social Rent and the acquisition of affordable homes through Section 106. Funding arrangements should also recognise the substantial and ongoing investment housing

associations are making in residents' homes, and the effect this has on the capital available for new development.

Build-out and Section 106 delivery

Affordable housing can support build-out by reducing reliance on private sales, provided housing associations have the capacity to acquire and manage the homes. Section 106 delivery can be constrained where price, tenure, location, specification or service-charge arrangements do not meet provider requirements. Early engagement with registered providers should therefore be embedded in the implementation of the final Plan, in line with the National Section 106 Affordable Housing Engagement Guidance, so that these issues can be addressed before they prevent acquisition or lead to later changes to the affordable housing offer. We address the detailed operation of Section 106 delivery under HN3.

National policy and consistent implementation

The final Plan and supporting evidence should explicitly address the National Planning Policy Framework (NPPF) published in August 2026. The NPPF's 'positive' soundness test expects spatial development strategies, as a minimum, to seek to meet objectively assessed needs and treats a strategy that does not provide for those needs as an exception. The Draft Plan proposes 558,000 homes between 2027 and 2036, while recognising the government's housing need figure of 850,000 homes. The final Plan should therefore explain how the proposed target has been assessed against this test and distinguish clearly between the level considered deliverable under current conditions and London's assessed housing need. It should set out a credible long-term strategy for closing that gap through investment, infrastructure and delivery reform. It should also set out what engagement has taken place with neighbouring authorities outside London on unmet housing need and how any scope for needs that cannot be accommodated within London to be addressed through wider strategic planning has been considered. The relationship between national requirements, London-wide policy and borough implementation should be clear, including appropriate transition arrangements where requirements have changed.

For strategic sites, the final Plan should also reflect NPPF policy HO13. It requires consenting frameworks to tailor the level of initial and subsequent detail to the scale and phasing of development and to remain flexible enough to respond to changes in housing need, infrastructure requirements, viability and design. This principle is directly relevant to the Plan's treatment of large phased developments, Opportunity Areas and potential New Towns.

Where the Plan establishes a London-wide approach, supporting guidance should minimise duplication and make clear the circumstances in which

additional borough requirements or local variation are justified. This would provide a more consistent basis for implementation across London while retaining flexibility where local evidence supports a different approach.

Consistent application will require adequately resourced planning teams and access to specialist advice. The GLA should support shared expertise across boroughs and clearer service expectations for pre-application and Planning Performance Agreement processes, helping reduce repeated requests, late redesign and avoidable financing costs.

Chapter 2: Making best use of land and achieving Good Growth

MBUL1 Spatial strategy

We support the brownfield-first strategy and the priority given to coordinating housing growth with the transport, utilities and social infrastructure needed to support it.

The flexibility in MBUL1 A(5) for early phases of strategic sites is helpful, particularly where front-loaded investment in remediation, transport, utilities or social infrastructure, alongside the sequencing of different housing types or delivery models, is needed to support the viability of a long-term development programme. For that flexibility to work consistently, implementation guidance should clarify how exceptions to the priorities in A(4) are to be evidenced and agreed, and how affordable housing and infrastructure commitments across later phases will be secured. For very large strategic sites, this should include a clear site-wide framework for overall commitments and agreed review points as later phases come forward. This would give boroughs and delivery partners greater certainty when planning complex phased developments while maintaining the Plan's overall priorities.

MBUL2 Optimising the use of land and site capacity

A more consistent approach to site optimisation can improve certainty and support additional housing in well-connected locations. Optimisation should mean identifying the most appropriate and deliverable capacity for a site, rather than simply the maximum theoretical density. In some schemes, relatively modest increases in density can require a different building typology, additional cores or lifts and more complex structural or building-safety solutions, with implications for construction cost and long-term management. The framework should therefore allow a range of viable building forms that provide suitable homes, usable amenity space and manageable long-term costs while making efficient use of land.

We support the recognition of site-specific circumstances and the scope for masterplanned areas to accommodate different densities and heights. Guidance

should make clear how these provisions operate together, including the evidence required where a scheme falls outside the indicative height or density range because comprehensive masterplanning or committed transport and infrastructure investment supports additional sustainable capacity above the range, or where site-specific constraints mean that the minimum density cannot be achieved. This would help ensure the framework is applied consistently while retaining the site-specific judgement already provided for in MBUL2.

The forthcoming Small Site Design Code should be tested on constrained infill and smaller affordable housing schemes. Applicants need clarity on how the code interacts with accessibility, servicing, amenity and existing neighbours. For sites dependent on planned transport improvements, the framework should explain the evidence and phasing needed to use future connectivity assumptions.

MBUL3 Tall buildings

We welcome the clearer distinction between tall buildings of 30 metres and above and metropolitan tall buildings of 100 metres and above, alongside the identification of locations where tall buildings may be appropriate. It is important that the London Plan accommodates different delivery models across London, including schemes with a mix of building heights. Clearer parameters can support investment decisions while allowing housing associations to take account of residents' needs and their long-term management responsibilities.

Guidance should clarify when committed future transport improvements can be reflected in assessing the connectivity criterion, including the evidence required on funding and delivery timescales. Building height should remain part of a wider assessment of design quality, local context, infrastructure and long-term occupation and management.

MBUL4 Utilities: capacity, connectivity and resilience

Planning for utilities alongside housing is essential to avoid late changes to layout, connection arrangements and delivery programmes. The Plan's emphasis on early coordination is useful, particularly in areas where several developments depend on the same network upgrades.

The plan-led approach should provide a clear starting point for applicants, with further assessment focused on outstanding constraints and material changes. Implementation guidance should clarify when capacity and connection

assumptions can reasonably be relied on, and how boroughs, utility providers and applicants should resolve constraints that remain.

For large phased developments, utility requirements and contributions should reflect the timing of demand and distinguish site-specific works from wider network investment. Where an upgrade provides capacity beyond the needs of an individual development, the contribution sought from that scheme should reflect the demand it creates and the wider benefit of the investment. Some essential infrastructure will need to precede the homes it serves, while requirements for later phases may change over a programme extending beyond the Plan period. Agreed review points should allow demand forecasts, costs and provision to be updated, with funding responsibilities established early and matters that remain unchanged carried forward rather than reassessed. Where permanent network reinforcement is committed but not yet available, guidance should also clarify when phased occupation or interim connections can safely support early delivery, including the capacity, resilience and service standards that must be demonstrated.

MBUL5 Sustainable transport to enable London's growth

We support the closer relationship between housing growth and investment in public transport, walking and cycling. Good connectivity is particularly important for affordable housing, giving residents better access to employment, education, care and everyday services.

On large phased developments, housing delivery can depend on transport infrastructure that serves a much wider area, including later phases, neighbouring developments and existing communities. The timing and funding of that infrastructure can therefore affect what can be delivered in the early phases, including affordable housing and local facilities. MBUL5 F's recognition of these wider benefits is helpful in reflecting that relationship. The proposed DLR extension to Beckton Riverside and Thamesmead is one example: the two major brownfield sites it would connect have the potential to support up to 30,000 homes and 10,000 jobs.

MBUL5 A and B already require boroughs to identify the transport interventions needed alongside growth and the developer contributions associated with them. For delivery partners, greater clarity on phasing would be useful, including which interventions are needed before early housing can proceed, which can follow later, where delivery depends on wider investment, and what interim transport provision is expected before major improvements are complete. For the strategic interventions identified in Annex D, the final Plan should also make clear, as far as practicable, which planned housing growth depends on their

delivery, their funding and delivery status, and the trigger points relevant to housing phases. This would provide greater certainty for long-term investment decisions and help ensure residents in early phases have suitable access from the outset.

Strategic transport schemes that unlock growth across multiple sites cannot always be funded through developer contributions alone. The final Plan should identify the wider funding package needed for interventions such as the DLR extension, including central government investment and, where appropriate, devolved funding mechanisms alongside site-specific developer contributions. Where further funding powers could support delivery, the Mayor should set out the case to government.

Delivery can also depend on approvals from third-party infrastructure owners and operators where development adjoins or affects rail, highway or utility assets. Early engagement should establish the relevant technical requirements, approval stages and likely timescales before designs are fixed. Where these interfaces create material costs or programme risks outside an applicant's direct control, they should be recognised in assessments of viability and deliverability.

MBUL6 High-quality design for a growing, changing city

For housing associations, robust materials and climate resilience have direct implications for residents and for ongoing repairs, maintenance and replacement. Durability, access for maintenance, reliable building systems and replacement costs all affect the quality of residents' homes and the costs they may ultimately face through service charges.

On complex schemes, these considerations sit alongside requirements on daylight and sunlight, overheating, energy performance, fire safety, site capacity and viability, which can pull a design in different directions. The Housing Design Standards London Plan Guidance should therefore be updated alongside the Plan, clearly distinguishing policy requirements from additional best practice and explaining how competing requirements should be considered together. This would help boroughs and design teams assess well-evidenced alternatives consistently rather than applying individual standards mechanically.

Independent design review can help resolve these issues early. The proportionate approach in paragraphs 2.88 and 2.89, including the clarification that design review should guide rather than dictate a scheme, is helpful. In practice, reviews should have an agreed scope, provide timely recommendations and record clearly how issues have been addressed. Where successive reviews provide conflicting advice, the reasons should be explained and a clear route to

resolution agreed promptly. For schemes that have already undergone an appropriate independent review, further analysis should focus on identified gaps rather than repeating the same assessment.

MBUL7 London's heritage

For residents living in older homes in heritage settings, the ability to improve energy efficiency and resilience to overheating can directly affect comfort and energy costs. MBUL7's support for sensitive energy-efficiency improvements, low-carbon energy and overheating measures is therefore helpful, as is its encouragement for boroughs to use design codes, Local Listed Building Consent Orders and Local Development Orders to provide greater certainty over appropriate works.

The practical issue for housing associations operating across London is consistency. Similar building types and retrofit measures can face different evidential and design expectations between boroughs, requiring the same issues to be worked through repeatedly. The GLA should support greater consistency by helping boroughs develop shared approaches for recurring building types and interventions, drawing on evidence from housing associations and heritage specialists. This could include supporting model approaches to Local Listed Building Consent Orders for recurring retrofit measures, such as appropriate solar installations or replacement glazing, which boroughs could adapt to their local heritage context.

Greater consistency does not require the same solution for every heritage asset. Guidance should establish common principles and evidential expectations while allowing decisions to respond to the significance and circumstances of individual buildings. This should include consideration of residents' comfort and affordability and the need for homes to remain suitable as the climate changes.

MBUL8 Inclusive design

Inclusive design needs to work throughout residents' use of a building, from initial occupation through ongoing management and, where necessary, emergency evacuation. We support early engagement with disabled people and other intended users, alongside consideration of maintenance and evacuation arrangements from the design stage.

The mechanism in MBUL8 D, explained in paragraph 2.113, for superseding the evacuation-lift requirement if an equivalent national requirement is introduced should be retained. Paragraph 2.108 should also define what constitutes 'substantial redevelopment' for the purposes of the evacuation-lift requirement. The definition should distinguish redevelopment that materially changes an

existing building from remediation or retrofit works requiring planning permission that do not materially alter its scale, internal layout, use or vertical circulation. Supporting guidance should be clear about the evidence needed at planning stage and the matters dealt with through building control. This would support consistent implementation and avoid asking applicants to demonstrate the same technical point through different regulatory processes, while maintaining the intended safety and accessibility outcomes.

MBUL9 Healthy streets and public realm

Public realm forms part of residents' everyday experience of a neighbourhood, and its quality matters from the earliest phases of a long-term development. We support MBUL9's emphasis on accessible walking and cycling routes, shade and places to rest, community involvement and the provision of usable public realm during early phases.

The longer-term issue is stewardship. Where public realm is privately managed, residents and other users need confidence that it will remain accessible, safe and well maintained, while the management arrangements themselves remain practical and affordable. For housing associations and other long-term stewards, decisions made at planning stage can have lasting implications for maintenance responsibilities and costs. If these costs are recovered through service charges, they can affect affordability for residents; if they are absorbed by the landlord, they can reduce the financial capacity available for maintaining existing homes and investing in new supply.

Guidance on MBUL9 D(5) would be useful in clarifying how the Public London Charter should apply where robust management and stewardship arrangements are already secured. The focus should be on achieving the intended outcomes for public access, inclusion, quality and maintenance, while avoiding additional controls that duplicate arrangements already delivering those outcomes.

MBUL10 Security and safety

Clear responsibilities between the planning and building-control regimes are important to effective fire-safety regulation. MBUL10 usefully places responsibility for demonstrating compliance with the planning fire-safety requirements on competent fire-safety professionals, rather than expecting planning officers to make technical fire-safety judgements.

We also support the commitment in paragraph 2.126 to monitor national fire-safety requirements and formally supersede Part C where equivalent national regulation makes the London-specific requirements unnecessary. Any such

statement should identify clearly which planning requirements cease to apply and the arrangements for schemes already in progress.

Until then, the division between the two regulatory processes should be reflected consistently in the evidence requested from applicants. Planning and building control processes should avoid requiring the same technical case to be demonstrated twice where the relevant evidence can be relied upon, without weakening the safety outcomes the policy is intended to secure.

Chapter 3: Delivering the homes and neighbourhoods Londoners need

HN1 Increasing London's housing stock

The proposed monitoring of housing approvals and completions provides a useful basis for assessing delivery against HN1. Reporting construction starts alongside these measures, with information on tenure and size, would help identify where progress is slowing and whether the homes being built meet the needs of households seeking affordable housing. To support this and keep reporting proportionate, existing planning and housing programme data should be used wherever possible. The proposed monitoring of housing approvals and completions provides a useful basis for assessing delivery against HN1.

Reporting construction starts alongside these measures, with information on tenure and size, would help identify where progress is slowing and whether the homes being built meet the needs of households seeking affordable housing. To support this and keep reporting proportionate, existing planning and housing programme data should be used wherever possible.

The proposed monitoring of housing approvals and completions provides a useful basis for assessing delivery against HN1. Reporting construction starts alongside these measures, with information on tenure and size, would help identify where progress is slowing and whether the homes being built meet the needs of households seeking affordable housing. To support this and keep reporting proportionate, existing planning and housing programme data should be used wherever possible.

Where delivery falls behind expectations, programme evidence could help establish the causes, including infrastructure delays, financing constraints and difficulties securing a provider for affordable homes. Regular engagement with housing associations would help the GLA and boroughs distinguish these constraints and identify the investment, coordination or policy changes most likely to support delivery. This would build on the scope for stakeholder feedback already provided through the Annual Monitoring Report.

HN2 Protecting and reshaping housing

We support the principle of replacing existing Social Rent floorspace, residents' right to return and their involvement throughout the process. The assessment of retention, refurbishment and redevelopment options should help residents understand how each would affect their homes, circumstances and neighbourhood, including the disruption involved and the longer-term benefits. Where redevelopment is justified, those benefits may include better-quality and more accessible homes, improved energy performance, safer and more usable shared spaces, and the opportunity to address design or management problems that are difficult to resolve through refurbishment alone.

Regeneration schemes must fund replacement homes alongside additional provision, while meeting the costs of temporary rehousing, home loss and disturbance payments, demolition and lost rental income. One member's experience on a small regeneration scheme illustrates these pressures. Rehousing costs are estimated at around £200,000, with approximately £170,000 more potentially required for temporary private rented accommodation because suitable rehousing options are limited. The scheme is also weighing refurbishment against redevelopment; the cost of addressing the existing building issues is close to the cost of delivering equivalent new homes, while the refurbishment works would not provide certainty over the longer-term structural life of the buildings.

Market sale and shared ownership receipts can help meet these costs, but their contribution varies with the scheme and market conditions. On smaller regeneration sites, there may be limited scope to include a small number of market-sale homes in a way that is viable and practical, further reducing the potential for cross-subsidy. While the Fast Track route offers a useful opportunity to reduce viability negotiations, our concern is whether its 50 per cent affordable housing threshold on net additional provision is achievable across schemes with very different replacement obligations and scope for additional homes. The amount of net additional housing is also only one part of the case for regeneration; some schemes may deliver substantial benefits for existing residents even where site capacity limits additional provision.

It would therefore be useful for the GLA to explain how the supporting viability evidence accounts for these differences, including the treatment of replacement homes, grant and the timing of expenditure and receipts. This is particularly important for schemes with limited additional capacity. Where the evidence shows that the threshold excludes otherwise deliverable regeneration schemes

from Fast Track, the GLA should consider a tailored route with transparent eligibility criteria and safeguards for existing residents and affordable provision.

The flexibility in paragraph 3.29 to consider affordable housing replacement across a wider regeneration programme could help providers plan these commitments. Its application should give residents clear information about where and when suitable replacement homes will be available, reflecting their wishes about returning. Agreed phasing and delivery commitments would help ensure that programme-level flexibility provides workable options for residents as well as providers.

HN3 Delivering affordable housing

Affordable housing thresholds and tenure

A clear threshold approach helps applicants and landowners account for affordable housing requirements early and can reduce prolonged viability negotiations where the thresholds are deliverable under prevailing market conditions. We support that principle alongside the Mayor's 50 per cent strategic affordable housing ambition. The thresholds should help schemes proceed while retaining the scope to secure more genuinely affordable homes, particularly Social Rent, where funding and viability allow.

The review arrangements in paragraphs 3.40 and 3.53 provide an opportunity to increase affordable provision as conditions improve. Providers also need sufficient predictability when acquiring land and committing to long-term programmes. A published approach explaining how borough-level increases and London-wide reviews will operate together, including the evidence for change and treatment of schemes already in preparation, would help reconcile these objectives. Monitoring should draw on transparent evidence on land values, development finance, sales rates, planning permissions, starts and affordable housing completions, so that lower thresholds do not become embedded where market conditions subsequently improve. Monitoring should also assess the number and tenure of affordable homes secured alongside housing starts, so that reviews consider the effect on both affordable provision and overall delivery.

The priority given to Social Rent also needs a clear expression in the tenure requirements applied to schemes. The low-cost rent category includes forms of housing beyond Social Rent. Clarifying how HN3 and borough policies together specify the Social Rent proportion expected, in line with national policy, would give applicants and providers a clearer basis for agreeing the affordable housing mix.

Where schemes provide 75 per cent or more affordable housing, the flexibility in HN3 D(2) to agree an alternative tenure split should also be retained in implementation. Borough-level requirements should not remove that flexibility where the proposed mix responds to local housing need, grant conditions and scheme viability.

For intermediate homes, the appropriate mix depends on households' ability to meet mortgage payments, rent and service charges together. Members have seen increasing affordability pressures in Shared Ownership where higher property values and service charges push total housing costs beyond the reach of the households the product is intended to serve. Evidence of demand should therefore be considered alongside the total cost to residents when determining the intermediate mix, so that provision responds to households' actual ability to afford the homes over the longer term.

Grant and viability

Grant can support higher levels of genuinely affordable housing and enable schemes that would otherwise not proceed. The expectation in paragraph 3.39 that applicants explore funding with boroughs, providers and the GLA is helpful in bringing those opportunities into planning discussions. In practice, uncertainty can arise over when anticipated grant can be included in viability calculations, which can prolong discussions about the affordable housing commitment. Members have also experienced additional complexity where grant interacts with affordable homes already secured through Section 106 obligations, particularly on schemes acquired under earlier programme assumptions.

Consistent guidance across the GLA's planning and investment functions would help resolve this. It should distinguish confirmed funding from potential grant, explain the evidence needed to support funding assumptions and make clear what additional affordable provision is expected. This would help providers, boroughs and developers agree commitments that reflect both the funding available and the opportunities to increase provision.

The viability evidence underpinning the Plan should also make transparent the grant and other public investment it assumes, and sensitivity-test delivery against lower levels of funding. This is particularly important for schemes with high levels of Social Rent and for estate regeneration, where grant may be fundamental to delivery.

Section 106 acquisition

Housing associations need to be involved while the tenure, design and management of affordable homes can still be influenced. Early discussions can identify specifications or service-charge arrangements that would make homes difficult to acquire or expensive for residents to occupy. We therefore support the engagement expectation in paragraph 3.39 and ask the final Plan to reinforce it through an explicit reference to the national Section 106 Affordable Housing Engagement Guidance.

Provider capacity remains a separate constraint. Even where a scheme's specification is suitable, wider investment commitments can limit a housing association's ability to acquire the homes. Limited bids may also reflect the asking price, tenure mix, location or size of the package. These different causes require different responses. Early engagement should therefore take place while these matters can still be influenced, rather than once the affordable housing offer is substantially fixed. Where marketing is unsuccessful, applicants should provide evidence of the providers approached, the reasons given for not bidding and the changes subsequently tested. Depending on the barrier identified, this could include changes to price, tenure or unit mix, specification, service-charge arrangements, package size or phasing. Where a particular product is shown to be unsuitable or unaffordable in that location, alternative affordable tenures should be explored before the overall level of affordable housing is reduced. This would give decision-makers a clearer basis for distinguishing between a genuinely undeliverable affordable housing offer and one that could be made deliverable through reasonable changes.

Fast Track and review mechanisms

We support proportionate reviews that secure additional affordable housing where justified and maintain incentives for timely delivery. HN3 H requires an Early Stage Viability Review for Fast Track schemes if substantial implementation has not taken place within two years of permission, or the period agreed by the borough. Paragraph 3.38 should reflect that condition clearly, so that it is not read as requiring an automatic review of every Fast Track scheme.

This is particularly important for large phased schemes, where the meaning and timing of substantial implementation may be less straightforward. Consistent guidance on substantial implementation, agreed milestones and the evidence required would help applicants and boroughs apply the review mechanism against the same expectations. It should also explain how delays outside an applicant's reasonable control, including Building Safety approvals, infrastructure dependencies and other third-party approval processes, are considered.

For strategic sites delivered over multiple phases, guidance should also explain how affordable housing commitments and viability reviews can operate at site-wide and phase level where major infrastructure or remediation costs are front-loaded. Any flexibility should be transparent and preserve the overall affordable housing commitment, with clear review points so that provision is not deferred without justification as later phases come forward.

On-site provision and payments in lieu

On-site affordable housing helps provide genuinely affordable homes within the neighbourhoods being developed. We support retaining it as the normal approach and limiting payments in lieu to justified circumstances. We also support HN3 J(3), which requires any affordable homes delivered off-site to be additional to the affordable housing requirement that already applies to the site on which they are provided. This is important to ensure that off-site provision results in a genuine increase in affordable housing.

The calculation and use of an agreed payment need to be considered together. Delays before a contribution is deployed to develop off-site affordable housing can affect the overall quantum it will support in times of cost inflation. Alongside the calculation approach referenced in HN3 J(2), guidance should explain how delivery costs and timing are taken into account. Where practicable, payments should be linked when they are agreed to an identified affordable housing project or clearly defined delivery programme, with an expected timetable for deployment and arrangements for reallocating the contribution if that delivery route cannot proceed. Receiving authorities should also report how contributions have been used and the additional homes achieved. This would provide greater certainty that payments in lieu translate into additional affordable housing within a reasonable period and allow their effectiveness to be assessed transparently.

HN4 Gypsy and Traveller accommodation

We support the minimum borough targets and the recognition of culturally suitable accommodation, including group housing. Offering this choice is important for households whose preferences are not met by their current accommodation, including families living in conventional housing. The provisions protecting family and community connections, accessible layouts and access to services would help ensure that new or replacement provision works for its intended residents.

Feedback from organisations working with Gypsy and Traveller communities raises questions about whether the evidence fully captures the range and scale

of accommodation need. Paragraph 3.62 provides a useful basis for further targeted engagement with communities and their representative organisations, including households interested in group housing and other culturally suitable homes. The GLA should explain how this evidence will inform local allocations and subsequent reviews, alongside the minimum pitch targets. This would help ensure that the range of provision reflects the choices households actually seek.

The proposed collaboration between boroughs, providers and community organisations should also help identify suitable projects for new provision and improvements to existing sites. Bringing the funding and management requirements into those discussions early would help establish which projects can proceed and what further support is needed.

HN5 Managing specialist accommodation

Supported, specialist and older people's housing can enable residents to live independently, access care and move to a home better suited to their needs. Increasing the supply of suitable and affordable older people's housing can also help residents who wish to move from homes that no longer meet their needs, while making larger social homes available for families who need them. Some provision also supports people leaving hospital or moving away from rough sleeping. We support HN5's positive planning approach, alongside the protection of existing provision under HN2 where need continues. Together, these policies provide a basis for increasing housing choice while retaining services on which residents rely.

For schemes providing care or support, providers need confidence in the funding for staffing and services as well as the capital available for construction. Short funding commitments or uncertain commissioning can prevent investment in new schemes and affect the continued operation of existing provision. A temporary absence of funding or commissioning should therefore be considered separately from evidence about whether the underlying housing need remains.

The Plan's connection to local supported housing strategies offers a basis for addressing these constraints. In implementing HN5, the GLA should work with borough housing and commissioning teams, health partners and providers to identify how the proposed housing pipeline will be supported by capital investment and multi-year revenue funding. Where national funding decisions prevent commitments being made, the GLA should make the case to government for the revenue certainty needed alongside housing grant. This would help providers assess whether they can sustain the accommodation identified through the planning process.

We also support designing accommodation around its intended residents, as required by HN5 G. Different service models create different requirements for access, communal facilities, servicing and staff support, so implementation should allow those needs to inform the design. Where residents are particularly vulnerable to heat, their needs should also inform overheating assessment and adaptation priorities. The resulting measures must be practical to operate and maintain, with their costs considered when investment and service arrangements are agreed.

HN7 Housing size mix

The greater need for family-sized homes within affordable tenures makes HN7's distinction between market and affordable housing important. We support using local housing registers to inform the affordable size mix, including larger family homes and wheelchair-accessible family homes. Applying this evidence alongside site optimisation would help ensure that the pursuit of additional homes also provides suitable accommodation for households waiting for affordable housing.

Providers working across boroughs would benefit from a consistent definition and reporting approach for family housing. Members have experienced inconsistent borough interpretations of what constitutes family housing, including whether this refers to homes with two or three bedrooms. Common terminology would make requirements easier to understand and compare, while allowing boroughs to determine the mix that meets local needs.

Delivering that mix also depends on funding. Our experience under the Affordable Homes Programme (AHP) 2021-26 was that relatively flat grant rates per unit did not fully reflect the higher build costs and lower rental income per square metre associated with larger family homes. This can make smaller homes easier to deliver even where local housing registers demonstrate acute need for larger homes. Future GLA investment programmes should better reflect the size and cost of the homes being delivered, including through greater use of grant based on habitable rooms. This would support providers to deliver the family-sized affordable homes identified through local evidence rather than allowing the funding model to work against the housing mix sought through HN7.

HN8 Housing design

We support maximising dual-aspect homes while retaining flexibility for well-designed single-aspect homes. On constrained sites and in taller buildings, aspect requirements can affect layouts and usable floorspace, so that flexibility has practical value. Its use should be supported by evidence that each proposed

home will achieve the passive ventilation, daylight, privacy and overheating outcomes required by HN8, taking account of its orientation, exposure to noise and pollution, and opportunities to open windows.

These outcomes depend on how design measures work together, and as such supporting guidance should explain the evidence expected when applicants rely on alternative design approaches or certification. It should address each relevant outcome, the future climate the home is likely to experience and the practicality of residents using the proposed measures. Evidence from occupied homes should inform subsequent guidance, helping distinguish approaches that perform reliably from those needing further improvement.

Members have raised differing views on the 2.4 metre minimum floor-to-ceiling height in HN8 B(2). The Draft Plan links floor-to-ceiling height to daylight penetration, ventilation, cooling and sense of space. Given concerns about the implications for building height, site capacity and viability, particularly on constrained sites, the final evidence should demonstrate how those benefits have been weighed against the additional design and delivery implications. The assessment should also consider the interaction with GHR4, including whether reduced floor-to-ceiling heights could constrain ventilation or cooling strategies or the space needed for associated services. Guidance should clarify whether proportionate flexibility is available where the intended residential-quality outcomes can demonstrably be achieved with a lower floor-to-ceiling height.

Private outside space should be both sufficient in size and usable in the conditions residents will experience. We support the minimum requirements in HN8 B(4), alongside guidance that considers wind, noise, orientation and other environmental conditions when assessing the quality and location of that space. This would help ensure that compliance results in genuinely usable amenity for residents rather than provision that meets the dimensional standard but performs poorly in practice.

HN8 D already allows family homes on higher floors where they have easy access to appropriate outside space. Supporting guidance should make clear how this alternative is assessed, so that the preference for the lower six floors does not become a fixed threshold where good-quality family homes can be provided higher in a building. The assessment should focus on access to suitable play and amenity space, storage, the practicality of lifts and communal areas for families with children, and the long-term management of those spaces.

The design baseline matters to housing associations acquiring homes through partnerships and Section 106, as it influences the specification available to us and the costs residents will face after completion. Early provider involvement

can help address those implications while layouts and shared facilities are still being designed. HN8 E and paragraph 3.103 provide a useful basis for considering maintenance and replacement at that stage. Design reviews should apply realistic assumptions about component lifespan, access for repairs and replacement, and the resulting service charges, so that initial savings do not create avoidable costs over the life of residents' homes.

HN9 Accessible housing

An accessibility baseline across tenures helps provide greater housing choice for disabled residents. We support provision across different home sizes and additional accessible housing where local evidence demonstrates need. Affordable housing has a particularly important role in providing suitable options for families who need both more space and wheelchair access.

The distinction between wheelchair-accessible and wheelchair-adaptable homes should align with national guidance. HN9 A(1) requires at least 10 per cent of affordable homes to meet M4(3)(2)(b), while Planning Practice Guidance states that policies for wheelchair-accessible homes should apply only where the local authority is responsible for allocating or nominating the occupier. The final Plan should therefore retain the requirement for wheelchair-user housing while distinguishing between M4(3)(2)(a) and M4(3)(2)(b) according to the allocation route, consistent with national guidance. This would provide accessible homes where they are required for occupation while allowing other wheelchair-user homes to be readily adaptable to meet future needs.

Early discussions between boroughs, providers, access specialists and intended residents can help align household size, accessibility requirements, location and tenure before designs are fixed. The assessment of take-up should consider these factors alongside price and the effectiveness of allocation or marketing arrangements, so that difficulty letting or selling an individual home is properly understood.

Delivering that provision also depends on the funding available. Members' experience under the Affordable Homes Programme 2021-26 was that accessible homes were driven primarily through planning requirements, with limited specific programme support for the additional costs associated with some wheelchair-user homes. Future GLA investment programmes should therefore consider targeted support for accessible provision, particularly larger wheelchair-user family homes, so that providers can deliver the homes identified through local evidence.

The same focus on residents' needs should apply to non-self-contained and specialist accommodation, where accessibility requirements need to reflect the service model, shared facilities and support arrangements. Post-occupancy evaluation can then identify whether those choices work in practice. We support the encouragement in paragraph 3.126 to undertake this with residents within 12 months of occupation. Practical guidance would help providers use existing evaluation processes to identify barriers, address problems and improve subsequent designs.

Chapter 4: Growing London's economy in a way that benefits all

GLE2 Supply of industrial land

Some industrial uses are difficult to accommodate alongside residents' homes because of noise, servicing and operational access requirements. The pooling and coordinated replacement of industrial capacity under GLE2 B offers a useful way to address these conflicts where land is suitable for housing through the release routes in PV5. We support this approach, including the opportunity to consider land swaps that provide suitable locations for both housing and industrial activity.

Where housing depends on replacement industrial provision, providers need to understand when suitable premises will be available. The Industrial Collaboration Working Group identified in paragraph 4.23 could help boroughs agree the location and specification of that provision, delivery responsibilities and timing. This would give practical effect to the requirement to plan for replacement capacity ahead of release, with attention to occupiers' operational needs alongside floorspace. Clear agreements would also help housing providers plan the developments that depend on those moves.

GLE3 Data centres

Where data centres and housing depend on the same electricity or water networks, changes in demand can affect the capacity available for new homes. GLE3's safeguards for housing land and infrastructure capacity are therefore important, alongside the monitoring and reassessment of cumulative impacts provided for in paragraph 4.31. Sharing relevant findings on capacity constraints and planned upgrades with housing delivery partners would help providers understand the implications for their programmes before committing to development.

GLE7 Affordable workspace

We support GLE7's broader approach to affordability, including service charges, fit-out costs, lease and rent structures and business rates alongside the headline rent discount.

At one affordable workspace operated by a G15 member, rents at 50 per cent of market levels only just cover the costs of operating and managing the space, while occupiers remain liable for business rates and other occupational costs. This illustrates why affordability needs to be assessed against the total cost to occupiers alongside the sustainability of the operating model. Supporting guidance should therefore help boroughs assess affordability and operator viability together, so that requirements remain sustainable over the period for which the workspace is secured.

Early engagement with workspace operators, as encouraged in paragraph 4.68, should also help ensure that space is designed, configured and managed around the needs of its intended occupiers. This should include practical matters such as unit sizes and subdivision, servicing and storage, utility capacity and metering, digital connectivity, access and the balance between private and shared space. These choices can be difficult and costly to change after completion. Specialist facilities should also be supported by evidence of likely demand and a realistic operating model, so that provision intended to meet a particular social, cultural or economic objective can be used and managed effectively.

The scheme-level affordable workspace strategy and management plan envisaged in paragraph 4.67 should also consider how intended occupiers will understand the full costs, lease commitments and services associated with the space. This is particularly relevant for start-ups and micro-businesses with limited experience of commercial leasing. Guidance should help boroughs apply these considerations consistently when setting affordable workspace requirements and negotiating planning obligations, so that the space secured is genuinely affordable, viable and fit for purpose for its intended occupiers.

LE8 Access to employment and skills

Housing associations' development programmes can offer training opportunities across several sites, helping participants gain the experience needed to complete their qualifications. The provisions in GLE8 B(3) and paragraph 4.74 allowing training to continue across borough boundaries are therefore valuable. They can help residents make use of successive opportunities as work progresses, including when the next suitable placement is outside their home borough.

For these reciprocal arrangements to work in practice, pan-London guidance should clarify how employment and training opportunities taken up by residents of neighbouring boroughs count towards local planning obligations, with safeguards to prevent the same outcome being counted more than once.

A London-wide brokering arrangement would help put these reciprocal arrangements into practice by connecting boroughs, employers and training providers. It could match participants to successive placements and coordinate the support needed to complete their training. Building on the starts-and-completions monitoring already proposed in paragraph 4.73, consistent recording would help participants' progress remain visible as they move between sites. Employment and training contributions could then be coordinated with existing provision and directed towards gaps in placements or support, with clear reporting on their use and the outcomes achieved. Monitoring should distinguish short placements from completed apprenticeships or qualifications and, where practicable, track progression into sustained employment.

GLE11 Circular economy

Designing homes so that components can be maintained, replaced and reused can reduce waste and support their continued use over many decades. GLE11's principles of longevity, adaptability and disassembly therefore align with our responsibilities as long-term landlords. We support the emphasis on using audits and circular economy statements to inform design while options remain open, particularly on large phased schemes where early choices will shape later construction and maintenance.

Those choices also inform whole-life carbon assessments, making the alignment required by paragraph 4.96 important to the way both processes operate. Compatible templates and clear instructions on where evidence can be reused would help applicants apply that requirement consistently. Where the metrics and assessment scope match, subsequent submissions could build on the same underlying evidence, updating it as designs develop and recording what is delivered after construction. This would reduce repeated assessment work while preserving the information needed to judge performance against each policy. The strategic waste targets should also be applied proportionately where site-specific constraints affect what can reasonably be achieved. Guidance should explain the evidence expected where a referable scheme cannot meet a target in full, while retaining the expectation to maximise reuse, recycling and recovery.

Chapter 5: Creating a greener, healthier, and resilient city

GHR1 Energy-efficiency

We support the use of absolute Energy Use Intensity (EUI) and Space Heating Demand (SHD) metrics in principle. A focus on energy demand and actual

performance can provide a clearer basis for assessing design choices and is directly relevant to residents' bills, comfort and the long-term operation of their homes. The GLA's supporting cost modelling indicates that construction-cost impacts vary between residential typologies, including an uplift of around 2.1 per cent for low-rise flats, while some other typologies show little or no additional cost, or a saving. In the current viability environment, even relatively modest increases can be material for individual schemes.

Member views on the proposed 40 kWh/m² residential EUI baseline differ. Some members support the proposed baseline, while others have raised concerns about whether it can be achieved consistently in practice across different scheme types and delivery conditions.

The final evidence and guidance should therefore explain the assumptions underpinning the modelling, how the proposed target compares with current Part L requirements and other local standards, and how it can be achieved through a range of design and construction approaches. This should include consideration of constrained schemes and any circumstances in which specialist design, construction or supply-chain capacity may be required. Where the final evidence, or subsequent implementation evidence, shows that the baseline cannot be achieved consistently across the range of development expected under the Plan, the target should be reviewed or proportionate flexibility provided.

For consistency to hold, applicants need to understand how the baseline and aspirational targets will operate in practice. Supporting guidance should distinguish the evidence needed to demonstrate compliance from the assessment of opportunities to achieve higher performance. It should explain the accepted modelling routes and calculation boundaries, including floor-area conventions, occupancy assumptions and the definition and treatment of unregulated energy, and how recognised modelling or certification routes can demonstrate performance against the Plan's metrics. Guidance should also explain how dwelling size and occupancy assumptions affect the residential EUI calculation and show the expected contribution of principal end uses, including space heating, hot water, ventilation and cooling.

The relationship with current and forthcoming national requirements, including Approved Document L and the Home Energy Model as it develops, should be explicit. Where the supporting evidence compares the proposed standards with Part L or other local planning standards, the assumptions and methodologies used should also be clear so that the comparisons can be understood consistently. The underlying methodology and assumptions should be published

in sufficient detail to enable independent technical scrutiny. The GLA should identify where the same underlying evidence can be used across planning and Building Regulations compliance so that applicants do not have to undertake materially duplicative assessments or reconcile inconsistent assumptions between the two processes.

The national-policy basis for those metrics also needs to be clear. The final justification should update paragraphs 5.19–5.20 against PM13, explaining how London's absolute targets relate to the national requirement to express locally set energy standards as a percentage uplift over a dwelling's Target Emissions Rate. Resolving that relationship alongside the technical guidance would help boroughs and applicants apply the standards consistently.

In-use monitoring can provide useful evidence on whether intended performance is being achieved and where improvements are needed. Members have, however, raised concerns about whether a mandatory five-year monitoring requirement can be implemented consistently across all tenures and ownership arrangements. In private sale and shared ownership homes in particular, providers may have limited ability to secure continued resident participation or access performance data over that period. The commitment in paragraph 5.17 to streamline reporting is helpful, but guidance should explain how these practical constraints will be addressed, including arrangements for resident participation, data access and privacy, the coverage of homes, reporting responsibility and duration. In interpreting in-use data, the GLA should distinguish building performance from occupant-related consumption as far as practicable, so that differences in household size or occupancy are not treated as evidence of poor building performance. Where continuous monitoring cannot reasonably be secured, the policy should provide a proportionate alternative route for demonstrating in-use performance. Providers also need sufficient clarity to account for installation, ongoing operation and programme costs.

The use of that information is equally important. Guidance should explain how reported performance will be assessed, whether any in-use performance thresholds will apply, and what investigation or action is expected where results differ from the design assumptions. This would help providers plan for the work involved and ensure that monitoring informs improvements to residents' homes and subsequent developments.

Roof-space decisions require a similarly clear approach to the benefits being sought. Paragraph 5.16 recognises that renewable generation, greening, amenity and building services may compete for space and gives priority to localised benefits where uses cannot be combined. We support that approach. Guidance

should explain how the renewable-energy expectations relate to national requirements and how benefits for residents, including lower energy costs, will be assessed alongside other roof uses. Safe maintenance access, waterproofing and durability also need to inform those decisions so that the selected measures remain effective over the life of the building.

GHR2 Low-cost low-carbon heat

Heating choices affect residents' bills and the costs of maintaining and replacing systems over many years. We support Low Carbon Heat Appraisals that consider these costs alongside carbon performance, building energy demand and available infrastructure. The comparison of individual and communal systems in paragraph 5.25 provides a useful basis for selecting an appropriate solution for each development.

A useful comparison needs consistent assumptions about the costs residents and providers will face. The appraisal template should make connection and distribution costs, heat losses, maintenance, replacement and residents' charges explicit over the same assessment period. All-electric options and opportunities to share heat between sites should be assessed where relevant, with realistic assumptions about the availability and carbon performance of proposed heat sources. Fabric efficiency should also inform that assessment because it affects demand and system sizing. Where the same inputs are used across GHR1, the Low Carbon Heat Appraisal and national compliance assessments, guidance should align them wherever possible, including occupancy assumptions and the treatment of domestic hot-water demand, so that applicants can reuse evidence and avoid unnecessary repeat modelling. Where an all-electric solution depends on electricity-network reinforcement, the appraisal should also reflect realistic connection costs and delivery timescales. The GHR1 EUI methodology and Low Carbon Heat Appraisal should also be aligned in their treatment of heat-generation and distribution losses, so that a heating solution supported through GHR2 does not create an unintended barrier to demonstrating compliance with GHR1.

Where active cooling is justified under GHR4, heating and cooling choices may also need to be considered together. Clarifying how the appraisal should address their combined energy use, running costs and maintenance would help providers assess the full implications of the proposed systems.

The interface with national heat-network zoning should remain explicit. Paragraph 5.25 already provides for an appraisal to be unnecessary where national requirements mandate a connection and the development proposes to comply. Guidance should help applicants establish when that provision applies

and when a comparison of heating options is still required. Where a future heat-network connection is not yet mandated, any requirement to safeguard infrastructure for a later connection should be proportionate to the evidence on the likely timing and deliverability of that network.

GHR3 Whole life-cycle carbon

Assessing carbon across a building's life allows decisions about construction materials to be considered alongside energy use, maintenance and replacement. Members support the objective of reducing upfront embodied carbon and continuing whole-life carbon assessment, but views differ on the deliverability of the proposed mandatory baselines. Some members consider the proposed targets achievable on current schemes, while others have raised concerns about their application across different building heights, construction systems and regeneration contexts, and the potential cumulative impact on viability. The GLA's supporting evidence provides a useful basis for the proposed targets, including modelling of residential typologies and their indicative cost impacts. The final evidence should make clear how representative these scenarios are of the wider range of development expected under the Plan, including different building heights, construction systems, regeneration contexts and supply-chain conditions. Where the evidence identifies material differences in deliverability, the final policy and guidance should reflect them through appropriate flexibility or implementation arrangements.

For regeneration schemes, retaining existing structures may reduce construction emissions, but the assessment also needs to establish whether they can provide suitable, accessible and energy-efficient homes. Paragraphs 5.31–5.32 recognise the relationship with site optimisation and the energy performance of replacement buildings. We support considering these together. The comparison of retention, refurbishment and redevelopment should also explain whether the existing accommodation can continue to meet residents' needs under each option, and the additional housing achievable, giving decision-makers a clear account of the benefits and limitations of each option.

Consistent calculation methods and reporting boundaries will be important to making comparisons across schemes reliable. Our initial evidence also underlines the importance of ensuring that reported figures are comparable across building types and design stages. Guidance should make clear whether emissions arising from the demolition of existing buildings form part of the calculation used to assess compliance with the upfront embodied-carbon baselines and, where they do, how those emissions should be reported consistently. The policy already links the pre-redevelopment audit to GLE11 and

requires in-use energy to use the same methodology as GHR1. Implementation guidance and reporting templates should align these requirements where the underlying data and assessment scope overlap, avoiding duplicate analysis and allowing the GLA to build a consistent evidence base for performance against the baseline and aspirational targets.

GHR4 Heat risk

Homes need to remain suitable for the temperatures they will experience throughout their lifespan, including where they provide accommodation for residents whose health or support needs increase their vulnerability to heat. We support addressing overheating early in the design process, while there is still flexibility to influence building orientation, layout and other design choices. GHR4's emphasis on passive measures and the urban heat island effect provides an important basis for protecting residents while limiting the energy and running costs associated with cooling.

The dynamic modelling provisions already identify relevant assessment methods and anticipate further guidance. For residential development, that guidance should explain clearly how the planning-stage assessment relates to the overheating assessment undertaken for Building Regulations Part O. Where different editions, weather datasets or assessment methodologies are proposed for planning purposes, the GLA should explain why the additional requirement is necessary and how applicants can avoid duplicating substantially the same technical assessment. Guidance should specify the editions, weather datasets and future time horizons to be used, together with the performance expected under each scenario.

Occupancy assumptions should be consistent across GHR1 and GHR4 where equivalent household assumptions are being used. Guidance should also explain how energy required for ventilation or cooling to manage a demonstrable overheating risk is treated under the GHR1 EUI calculation, so that the two policies do not create conflicting compliance expectations.

The assessment also needs to reflect how residents can use their homes in practice. Noise, poor external air quality, security concerns or restricted window openings may limit residents' ability or willingness to rely on open windows for ventilation, particularly overnight, while some residents may find particular controls difficult to operate. These circumstances should inform the choice of passive measures and any additional cooling, alongside maintenance and running costs. For communal heat networks, this includes applying the policy's requirement to reduce internal gains from hot-water and heating services.

Where future-climate modelling identifies residual overheating after reasonable passive measures have been incorporated, the response should be proportionate to the severity and duration of the risk and the needs of likely residents. It should not create an automatic expectation for fixed active cooling where other measures or appropriate future-proofing can manage the risk effectively. Where modelling indicates that active cooling may become necessary later in a building's life, guidance should address proportionate future-proofing, including plant space, servicing routes and electrical capacity, so that efficient cooling can be introduced without disruptive retrofit.

We support the flexibility in paragraph 5.42 to use other measures where external shading is impractical on upper storeys of tall buildings. Guidance on the priority given to reflective roof materials would also benefit from explaining how their heat-reduction performance should be considered alongside waterproofing, durability and maintenance. This would help design teams select measures that provide lasting protection against overheating and remain practical to maintain.

GHR5 Flood risk and drainage

Constrained urban sites may have limited opportunities to achieve the full surface-water reduction sought through on-site measures. In some locations, contributing to wider green drainage infrastructure can also provide benefits across an existing neighbourhood. We support GHR5's flexibility to combine on-site measures with appropriate off-site interventions, linked to catchment priorities and the drainage hierarchy.

Providers relying on off-site measures need to understand how the proposed reduction will be achieved and when. The delivery pathways envisaged in paragraph 5.51 should identify the relevant intervention, the body responsible, funding arrangements and ongoing maintenance. This would help applicants and decision-makers assess the effect of a contribution and establish how the development will remain safe, including where wider works will follow later phases.

Paragraph 5.55 recognises that the full calculated contribution may not be viable and allows prioritisation in areas of particular risk. Guidance should explain how the resulting contribution and expected runoff reduction will be assessed in those circumstances. This would make the relationship between viability, local risk and the mitigation secured clearer, while retaining the requirement that development does not increase surface-water runoff.

GHR6 Trees, biodiversity and geodiversity

Retaining valuable trees and establishing resilient planting can improve residents' access to nature while contributing to shade and habitat. Those benefits depend on successful establishment and continuing care. We support the provisions in paragraphs 5.64–5.65 for securing monitoring, replacement of failed planting and early maintenance, including suitable off-site provision where full on-site replacement cannot be achieved. For housing associations managing neighbourhoods over the long term, agreeing these arrangements alongside the planting proposals helps ensure that the intended benefits can be sustained. On large phased regeneration programmes, tree strategies should also be considered across the full development programme. Decisions about retention and planting in earlier phases can affect the layout and deliverability of later phases, so guidance should allow these implications to be assessed against the long-term regeneration plan while maintaining appropriate protection and replacement of valuable trees.

GHR7 Green Infrastructure and Urban Greening Factor

We support the Urban Greening Factor (UGF) as a consistent way of incorporating greening into development. Its value to residents depends on the measures addressing local needs, including shade, drainage, habitat and access to usable outdoor space. The connection to local priorities in paragraph 5.85 is therefore important and should guide the choice of measures used to meet the target.

Application can be more difficult on constrained sites and large phased masterplans, particularly where the assessment boundary includes public highways with limited opportunities for greening. Because the calculation uses total site area, the boundary can materially affect what the applicant must provide. Guidance should explain how these circumstances will be assessed and how shared green infrastructure delivered across phases can contribute to the overall requirement.

We propose allowing a wider-estate approach where improvements on other land under the applicant's control would provide equivalent or better benefits for the development and surrounding residents. Clear criteria should require applicants to demonstrate those benefits, relate delivery to the relevant housing phases and secure long-term management. This would provide a route for assessing proposals that can achieve better local outcomes across connected sites and make the benefits of development more tangible to existing residents and the wider community.

The separate assessment of UGF and biodiversity net gain should be retained, as the measures serve different purposes. Where the same planting or habitat

information supports both calculations, coordinated submissions should allow that evidence to be reused while retaining the separate reporting required by paragraph 5.86.

GHR8 Accessible green space

The amount and proximity of green space are important, but residents also need safe routes, usable facilities and spaces that remain comfortable in a changing climate and are supported by clear long-term management and maintenance arrangements. The GLA's planned support for boroughs in developing standards could also help establish a consistent approach to assessing quality, usability and resilience alongside the quantity and access measures.

Where there is limited scope for new provision, the flexibility in paragraph 5.94 to improve existing spaces and connections can benefit both new and existing residents. Their involvement should help identify the improvements most useful locally. Where off-site contributions support those works, the agreed arrangements should make clear which improvements will be delivered, how they will benefit the development's residents and how they will be maintained. This would give practical effect to the policy's existing provision for targeted contributions and secured management plans.

GHR9 Clean and healthy waterways

Waterside neighbourhoods need to provide safe public access while retaining the space required for maintenance and future flood-defence improvements. These responsibilities may continue long after housing is completed. We support the integration of those functions through GHR9 and the riverside strategy principles, including early identification of land needed for future works.

For long-term housing providers, the practical question is how access and responsibilities will operate as those works become necessary. Agreed arrangements between landowners, infrastructure bodies and delivery partners should address who maintains the relevant areas, how future works will be accommodated and how public access will be managed during them. Establishing this alongside the spatial requirements would help avoid later conflicts between residents' safe use of the waterfront and essential maintenance or defence works.

GHR10 Air quality

Protecting residents from poor air quality needs to be considered alongside ventilation and overheating. A design that relies on opening windows for cooling

may be unsuitable where external pollution or noise prevents residents doing so. We support GHR10's early, iterative assessment approach, with the findings informing building layout and ventilation choices alongside the requirements in GHR4 and HN8. This would help ensure that measures addressing one risk remain compatible with residents' other needs.

Paragraph 5.115 already allows the Air Quality Neutral assessment to form part of a wider Air Quality Assessment. This is a useful basis for coordinated evidence. Guidance should explain how assessments can build on earlier work as proposals develop, distinguishing information that remains valid from changes requiring further assessment. This would retain the iterative approach while focusing additional work on changes to the design, construction proposals or surrounding conditions that could affect the conclusions.

GHR11 Cycle and car parking

Secure, accessible and conveniently located cycle parking is important to supporting cycling, but the space required can be significant on high-density housing schemes. On one major scheme, 1,183 cycle parking spaces are being delivered for 651 homes, occupying around 1,200 m² of net internal area, equivalent to the floorspace of around 17 three-bedroom homes. This illustrates the need to consider the amount of cycle parking alongside its design, accessibility and effect on the overall use of a constrained site.

We therefore support the flexibility in paragraph 5.123, which allows the minimum requirement to be reconsidered where site or design constraints would otherwise require additional basement construction or have a disproportionate effect on usable floorspace. This flexibility should be carried through consistently in Transport for London guidance and borough decision-making. Applicants should have a clear route to demonstrate where a lower level of provision would achieve an appropriate balance between anticipated demand, informed where possible by evidence of actual utilisation on comparable occupied schemes, high-quality accessible cycle parking, development capacity and viability.

Members have also raised concerns about how the proposed maximum car-parking standards will operate for larger family homes in less well-connected suburban locations. The 2021 London Plan allowed boroughs to consider higher provision in outer London locations with low public transport accessibility where clear evidence showed that this would support additional family housing. Equivalent flexibility is not apparent in GHR11. The final Plan should provide an evidence-based route for higher provision in defined circumstances, taking account of transport accessibility, on-street parking pressure, local patterns of

car dependency and the delivery of family housing. This should remain an exception supported by evidence, rather than weakening the Plan's wider approach to reducing car dependency.

Car-free and car-lite development must also work for disabled residents. Part J allows on-street disabled persons' parking to be designated as it becomes required at otherwise car-free developments, with on-site provision where there is no suitable nearby space. This needs to work over the lifetime of a development, as residents' mobility and parking needs may change after first occupation. Guidance should clarify how the availability and location of suitable on-street provision will be established at planning stage, how capacity for future spaces will be maintained or reviewed, and how boroughs will ensure that spaces can be provided when residents need them. This would give residents and housing providers greater certainty that accessible parking will be available in practice.

Chapter 6: Place visions and place-based approaches

PV1 Brownfield First Opportunity Areas

Large brownfield developments can depend on decisions about land, infrastructure and services across several sites or boroughs. We support PV1's coordinated approach because it can help resolve these dependencies before providers commit to housing phases, while involving existing communities in shaping the wider neighbourhood.

The scope for Opportunity Area Planning Frameworks to provide coordination where local plans have not achieved it is useful. Clearer guidance on their relationship with local plans would help where development spans borough boundaries or progresses ahead of a plan update. In particular, providers need to understand how decisions on shared infrastructure and community facilities will be agreed, and who leads when authorities' programmes do not align. Resolving these matters through the area framework would reduce uncertainty about commitments that individual housing schemes depend on.

Long delivery periods also mean that early investment decisions must account for later phases. We support applying HN1's longer-term capacity requirement through area frameworks that consider the whole development programme, establishing the critical infrastructure, spatial principles and early delivery commitments needed to support initial phases while allowing later-phase detail and capacity assumptions to be updated through agreed review points as infrastructure, housing needs and delivery circumstances evolve. Where new

delivery bodies are established, their relationship with existing planning arrangements should also be clear.

Mayoral Development Corporations (MDCs) can be given plan-making and development-management powers, changing the responsibilities of boroughs within the development area. Where an MDC or another dedicated delivery vehicle is used for a New Town or Opportunity Area, the governance arrangements should set out how its functions relate to the London Plan, borough local plans and the relevant Opportunity Area Planning Framework, including responsibility for infrastructure, funding and delivery. This would help providers and communities understand which bodies are responsible for the commitments affecting them.

PV5 Industrial land supporting housing growth

We support the routes in PV5 for suitable industrial land to contribute to housing supply, including the specified locations where housing-led proposals can proceed ahead of formal release from industrial designation. This provides scope to progress housing where the strategic case for a change of use has been established, while retaining the safeguards for industrial capacity and operations.

The emphasis in paragraphs 6.33–6.34 on identifying parcels of a deliverable size and shape is important. Working with landowners to resolve boundaries, access and enabling works would help establish how those parcels can accommodate housing in practice. Where development also depends on replacement industrial provision elsewhere, those arrangements need to be considered together; resolving the housing site alone will not establish when it can proceed.

Guidance on the relationship between PV5 B and GLE2 B would therefore be useful. It should explain what evidence and commitments are expected for replacement provision when housing is approved ahead of formal release, and how the relevant delivery milestones are secured. This would help providers plan housing programmes against an agreed sequence while giving effect to GLE2's expectation that replacement capacity is planned in advance of release. The suitability of that capacity for industrial occupiers is addressed in our response to GLE2.

PV6 Metropolitan Open Land

We support protection of Metropolitan Open Land (MOL) that fulfils its strategic functions and the scope for justified boundary changes through the plan-led process. Where evidence indicates that existing MOL makes a limited contribution to those functions, targeted review could establish whether a

different configuration would improve public benefits while enabling housing. The final Plan should encourage boroughs to undertake such reviews where there is a clear strategic opportunity, applying the MOL purposes and exceptional-circumstances tests. Reviews should consider accessibility, quality, ecological function and the needs of the surrounding community, with residents involved in the process.

The scope in PV6 C(2)(iii) to secure a net gain in both the quantity and quality of MOL serving a similar catchment offers useful flexibility for comprehensive masterplans. In phased developments, however, existing space may be affected before replacement provision is available. Guidance on the timing of replacement provision, continued public access and long-term management would help applicants demonstrate how the intended benefits will be secured throughout the development programme.

Where MOL is released for residential development, we support a minimum 50 per cent affordable housing requirement. This would ensure that the housing enabled by release makes a substantial contribution to meeting affordable housing need. The affordable housing commitment should be secured alongside the agreed improvements and long-term arrangements for retained or replacement open space.

PV7 Sustainable development and enhancement of the Green Belt

We support directing Green Belt development to sustainable locations where new homes can be served by suitable public transport, services and accessible green space. The land-use, transport, phasing and design strategies required by Box PV7B provide a useful basis for coordinating these requirements. Their application should make clear what will be available when residents move into early phases and how facilities needed for subsequent phases will be provided. This would help housing associations make long-term commitments with confidence in the neighbourhoods their residents will occupy.

We support the 50 per cent affordable housing expectation. The proposed reduction to 35 per cent for schemes of 36 homes or more providing significant transport infrastructure needs clear justification in the final evidence. The final NPPF requires Green Belt affordable housing requirements to be set above the level applying to comparable non-Green Belt development and at no less than 50 per cent unless that would make development unviable. The final Plan should therefore explain how the 35 per cent exception has been tested against both

requirements, particularly where the equivalent non-Green Belt threshold is also 35 per cent.

Applying the exception consistently will also require clarity about what qualifies as significant transport infrastructure and the scale of the development's contribution to its delivery. Eligibility for the lower threshold should reflect the transport costs actually borne by the development, taking account of grant and other public or infrastructure funding. Clear funding responsibilities and delivery milestones would help ensure that the reduction in affordable housing corresponds to infrastructure that is necessary to support the development and will be delivered.