

The Mayor of London

By email only londonplan@london.gov.uk

20 June 2025

Dear Mayor of London,

Page | 1

RE: Towards a New London Plan – Public Consultation - Response on behalf of the London Property Alliance

I am writing on behalf of the London Property Alliance CPA/WPA (“LPA”) to respond to the consultation on the *Towards a New London Plan* document.

The LPA is a not-for-profit membership body and advocacy group representing more than 300 of the leading owners, investors, professional advisors and developers of real estate operating in the Cities of London and Westminster, via our respective associations City Property Association (CPA) and Westminster Property Association (WPA). The LPA provides a unified voice for the real estate sector across London’s Central Activities Zone. You can see a full list of our members for our respective bodies [here](#) and [here](#).

The LPA fully supports the Mayor’s twin key objectives to fix the housing crisis and deliver sustainable economic growth. The planning system is a key enabler of growth, and our own research, *Good Growth in Central London*, revealed that a balanced approach to growth with flexible planning policy in the Central Activities Zone (CAZ+) could unlock 407,000 jobs, 50,700 new homes and an additional 55.7m sq ft in commercial floorspace by 2045 – boosting the UK economy by £101bn (GVA).

Sustainable economic growth cannot be achieved without a strong supply of offices, work and laboratory space that can accommodate the next generation of talent, boost productivity, foster innovation and support some of London’s most important growth industries.

However central London’s CAZ+ has seen a 54% fall in major office planning applications between 2013-2023. Westminster’s portion of the CAZ comprises 60% of office space within it, and has seen a loss of over 3.7m sq ft in office floorspace since 2019 alone. To help reverse this trend, it is essential that a new, streamlined London Plan safeguards the provision of workspace in core areas, is flexible on key strategic matters and recognises development viability as a challenge which could hold back growth.

The LPA supports the Mayor taking a London-wide approach on strategic matters, providing a flexible policy framework which enables boroughs to develop pro-growth policies for their local area.

We welcome the opportunity to respond to this consultation and our detailed representations on the Mayor’s *Towards a New London Plan* document (“TNLP document”) can be found at Appendix 2 attached to this letter.

As the London Plan emerges, we hope to continue our strong engagement with the GLA and TfL on its progress on behalf of our members.

Yours sincerely,



Charles Begley
Chief Executive, London Property Alliance

Appendix 1 – Planning for London call for evidence

Alongside these representations, the LPA submits the following documents to the Mayor for consideration as evidence in the drafting of the new London Plan:

1. [Global Cities Survey](#), London Property Alliance/Centre for London March 2025.
2. [Cycling & the City](#), City Property Association, December 2024.
3. [Good Growth in Central London](#), London Property Alliance/Arup, 2024.
4. [Delivering Good Growth in Westminster](#), Westminster Property Association 2024.
5. [Retrofit First, Not Retrofit Only: A focus on the retrofit and redevelopment of 20th century buildings](#), London Property Alliance/JLL 2022.
6. [Zero Carbon Westminster: A Focus on Retrofit in Historic Buildings](#), Westminster Property Association, December 2021.
7. [City of London Visitor Accommodation Sector Commercial Needs Study](#), City of London/Avison Young, January 2023.
8. [The Crossrail Effect: How the Elizabeth line is transforming the capital](#), London Property Alliance/Knight Frank, 2023.
9. [London's Knowledge Clusters: From emerging to maturing](#), London Property Alliance/Future Places Studio, 2023.

Page | 2

Appendix 2 – London Property Alliance – Representations on Towards a New London Plan Consultation

Overarching points

1. **Key objectives** – The LPA strongly supports the Mayor's two key objectives to fix the housing crisis and deliver sustainable economic growth. The provision of a wide tenure of homes which cater for the range of demand, including – but not limited to – affordable housing, is critical for London to function. The LPA agrees with the Mayor's support of the CAZ as the UK's economic powerhouse, and the safeguarding of its commercial uses. The LPA also supports the Mayor's recognition of the importance of development in Opportunity Areas and other economically important clusters. There is a need for the CAZ, in particular, to evolve and grow to meet future demand.
2. It is essential that the London Plan not only enables economic growth but **actively encourages and incentivises it**. The Mayor's London Growth Plan is unequivocal that London has huge growth potential which is yet to be unlocked. The London Plan is a critical tool in delivering this so it is crucial that it is framed to realise the capital's growth ambitions. Central London, and the CAZ specifically, are key to these ambitions and we strongly urge the next London Plan to properly plan for this growth and is future proofed to ensure that sufficient floorspace of excellent quality can be delivered to meet evolving demand.
3. Achieving the Mayor's housing targets must be delivered alongside promoting strong economic growth, particularly in central London, in order to maintain London's competitiveness.
4. **Strategic planning** – The LPA strongly supports the Mayor's approach to optimising sites across London, including around existing and planned transport nodes. The opportunities which central London provides, in terms of sustainable brownfield development with excellent transport links, should be maximised.
5. **Streamlining** – The LPA strongly supports efforts to streamline the London Plan and encourage the Mayor to focus the next London Plan only on matters of strategic importance. The Greater London Authority Act (1999) requires the Mayor to produce a spatial development strategy for "general policies in respect of the development and use of land in Greater London" (s344(3)) which "must only deal with matters which are of strategic importance to Greater London" (s344(5)).

In a number of areas, the current London Plan provides overly prescriptive policy requirements on matters which are not of strategic importance and go beyond the expectations of the national-level policy framework and other regulatory requirements outside planning. Cumulatively, these create burdens upon development and ultimately disincentivise investment and growth. The LPA supports the Mayor taking a London-wide approach on strategic matters, providing a flexible policy framework which enables boroughs to develop pro-growth policies for their local area.

Mayor's Foreword

1. **Key objectives** – The LPA considers that the delivery of housing which meets a variety of needs is critical to London's economic success and its status as a global city. Whilst the LPA fully endorses this objective, it is essential that the right balance between residential and commercial, and their location, specifically in the city's core commercial centres, is struck.

2. **Strategic planning** – The revised housing target presents a significant increase above existing housing delivery. It will be important to best optimise sites across London to maximise delivery, including around existing and planned transport nodes. It is vital to London's success that London's commercial centres continue to be able to grow and adapt to accommodate projected changes in demand. We would urge the GLA to ensure that demand for growth and change in commercial uses including workspace and other sectors including research, technology and innovation is properly considered, evidenced and planned for. The New London Plan should enable growth, adaptability and flexibility in the commercial sector. This would align with the aspirations of the Mayor's London Growth Plan.

Our technical comments relate to the specific subjects from the following consultation sections:

2. Increasing London's housing supply

2.3 Opportunity Areas

2.4 Central Activities Zone

2.13 Planning for affordable housing

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

3.1 The Central Activities Zone

3.2 Specialist clusters of economic activity

3.6 Town centres and high streets

3.5 London's night-time economy

3.7 Visitor economy

3.8 Digital infrastructure

3.9 Access to employment

3.10 Affordable workspace

4.1 Building height and scale

4.3 Supporting a denser London linked to transport connectivity

4.4 London's heritage

4.6 Heat risk, ventilation and overheating

5.1 Energy efficiency standards

5.2 Heat networks

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

5.7 Green infrastructure and biodiversity

5.10 Flood risk management

5.14 Car parking, cycle parking and deliveries

5.16 Fire safety

5.17 Air quality

2 Increasing London's housing supply

1. **Housing demand** – There is pressing demand for housing within London of all tenures and the LPA strongly supports the Mayor in delivering more housing across the Capital.
2. The Plan should seek to ensure that the need for housing, of a range of different types and values, is addressed, potentially by introducing a presumption in favour of developments delivering housing, to help speed up housing delivery. Ensuring a good supply of a range of housing types, catering to the breadth of need that will exist in a global city, is vital to maintaining and enhancing that global city status.
3. The London Plan should look to incentivise and encourage growth across all housing sectors and products and all tenures, in order to ensure the creation of balanced communities and enable the delivery of affordable housing, whilst recognising the challenges of delivering affordable housing. The recent appeal at Stag Brewery highlights some of the viability

challenges in bringing forward residential development and the importance of ensuring that obligations are proportionate in order to enable delivery.

2.3 Opportunity Areas

1. The desire for the Plan to accurately reflect the current status, and capacity, of Opportunity Areas to accommodate further development is reasonable and consistent with ensuring proper planning. However, given the importance of accommodating growth to the economy and prosperity of the country, the Plan should ensure that the approach does not act to prevent growth-supporting development which is suitable for the context. The LPA's view is that the suggested alterations of the Opportunity Areas' status, with some effectively being 'de-designated', could lead to the unintended prevention of suitable development in areas where such development would be suitable to its context and would be consistent with the strategic direction of the New London Plan overall. For example, within the CAZ, both the Paddington and Tottenham Court Road Opportunity Areas have accommodated significant development already but have also benefitted very recently from significant increases in capacity derived largely from the substantial public investment in the Elizabeth line, meaning they could support significant further growth and investment in ways suitable to their context. Whilst the Victoria Opportunity Area has seen significant growth, the potential for significant further growth remains, in part associated with potential improvements and alterations to the mainline station and, potentially, the delivery of Crossrail 2. The capacity for accommodating further development may be equally applicable to other Opportunity Areas within the CAZ. Consequently, the LPA would not support a change to their status to areas where little further development can be accommodated. To do so would introduce unnecessary additional constraint to areas that retain capacity for the significant additional growth sought by the emerging plan.

Page | 5

2.4 Central Activities Zone

1. **The role of the CAZ** – The LPA strongly supports the GLA's recognition of the CAZ as the UK's economic powerhouse and the safeguarding of commercial uses. The CAZ is London's beating heart, pivotal not only to London's prosperity, but to the rest of the UK as well – the CAZ along with the Isle of Dogs contributes almost half (48%) of London's GVA and 41% of the capital's jobs, despite occupying just 2.2% of Greater London's land area¹. It is an engine of jobs growth, providing employment opportunities that span beyond its borders to outer London and the South East. But the CAZ is more than just a commercial hub, it also houses numerous important cultural institutions, high streets, heritage sites, world-renowned universities and bustling nightlife spots. Whilst the LPA consider that the core CAZ should be protected for commercial uses, there should be flexibility for sites outside of the core area to come forward as housing, or other uses where the need for them is demonstrated.
2. We note the potential for some alterations to the boundaries of the CAZ in some locations. We consider that the scope for reducing the CAZ area is limited, although there may be small areas that are clearly of residential character where this may be appropriate. It is essential that a more flexible approach is taken to sites in more peripheral parts of the CAZ (whether they remain within its boundaries or not) to change use to alternative uses. This may require some changes to existing London Plan Policy SD5(G).
3. The LPA has produced a research paper, Good Growth in Central London (2024) which considers how the CAZ and the North Isle of Dogs (CAZ+) might utilise opportunities to accommodate significantly more economic activity and a higher residential population. The report advocates for a 'balanced growth' in floorspace, employment and homes. The 'Balanced

¹ Good Growth in Central London, London Property Alliance and Arup, 2024

Growth' scenarios assume the delivery of around 407,000 jobs, 41m sq ft of office space and 2,300 new homes by 2045 in CAZ+.

4. Any London Plan policies coming forward in respect of the CAZ must ensure they promote and support strategic CAZ functions. Any associated planning obligations should be framed in this context of positive delivery and proportionally and should not result in disincentivising development, to help ensure this approach is taken holistically across London. The LPA is keen to ensure that the London Plan seeks to address and overcome constraints on optimising site capacity within the CAZ, across a range of uses, noting that the combined effect of non-planning regulatory change and other policy objectives has made delivering development more challenging, with 81% fewer major applications determined in 2023 than in 2016 in the City of Westminster, which forms a substantial portion of the CAZ².
5. In this context, whilst the LPA emphatically supports retaining a rich mix of uses within the CAZ, including an element of residential, it suggests that requirements for mixed use buildings are not practical and impose a significant additional constraint on capacity. The LPA suggests that the next London Plan therefore includes policy direction which priorities commercial growth within the CAZ and states that mixed-use policies requiring housing from commercial schemes will not be appropriate.

2.13 Planning for affordable housing

1. **Threshold requirements** – The LPA supports a review of the threshold requirements and an approach to balance 'ambition' with 'practical implementation'. The assertion that the threshold approach has helped to embed affordable housing requirements into land values and speed up the planning process is questionable. The Mayor should look to establish practical policies which can actually incentivise growth and enact change. The recent appeal at Stag Brewery highlights some of the viability challenges in bringing forward residential development and the importance of ensuring that obligations are proportionate in order to enable delivery.
2. **Affordable tenures** – Any policy on tenure must take into account local need and demand, the ability for the area to facilitate delivery (noting for example the higher land prices and construction costs in central London) and existing housing stock. Generally speaking, central London authorities currently house more social rent than outer London boroughs – ONS (2021) data shows that on average, central London authorities house 16% social rent compared to 9% in outer London boroughs³.
3. There are significant complexities associated with developing and operating many affordable housing products, for example regarding aspects such as financing, service charge, rent and other cost inflation and the variation in selection criteria and procedures. There would be great benefit in engaging extensively with affordable housing operators in composing detailed policy in any new Plan, to ensure that the barriers to the delivery of affordable housing are reduced as far as possible, to maximise the delivery of affordable housing to meet the varied needs of those living in London.

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

1. **Build to rent, PBSA and co-living** – The LPA supports the development of BtR, PBSA and co-living products and their role in meeting a variety of needs within the housing market. Particularly within the CAZ, these products often do not present the same challenges as traditional residential. They are usually not captured by long leasehold restrictions which

² Delivering Good Growth in Westminster, Westminster Property Association, 2024

³ Data taken from ONS 2021 and 2011 Census data for London wards – Tenure-households (January 2023)

enables the buildings to be adapted more easily and can remain flexible for future use. There often is also not the same conflict between occupiers and surrounding commercial assets including leisure and restaurants/drinking establishments etc.

2. The LPA would support London Plan policies which supported these sectors, which we consider are important to tackle the housing crisis in London. Any associated policy requirements, such as affordable housing, family housing, or open space for example, should not be so onerous as to disincentivise development. Where these uses come forward in central London locations, the ability of sites to meet a range of policy objectives can be constrained but this does not mean that schemes are not without merit.

3.1 The Central Activities Zone

1. **The future of office working** – The LPA strongly supports the importance which is placed on the CAZ continuing to evolve, improve its resilience and ensuring that there is enough Grade A and EPC compliant floorspace provided across the area to meet future demand. There is high demand for high quality, well-connected commercial floorspace (primarily office) and this is continuing to increase post-pandemic. The LPA's Global Cities Survey, March 2025, notes that London has the lowest vacancy rates of its comparator global cities and that public transport usage continues to climb correspondingly⁴. Knight Frank's February 2025 London Insight notes Prime vacancy rates in the West End Core market of only 0.3%, essentially representing a total of only five available buildings⁵. It is imperative that the London Plan plans properly for economic growth and a return to the office, with the Plan future-proofed to ensure that sufficient floorspace can be provided to meet needs. The LPA welcomes the recognition that the upgrading of a substantial amount of existing buildings is required to meet various new regulations, such as those seeking environmental performance improvements. The LPA suggests the New London Plan should explicitly support such proposals.
2. The LPA notes that the planned evidence base for the next London Plan does not include an Office Policy Review, just employment projections and CAZ evidence (capacity and functions). The LPA strongly urges the GLA to ensure that the evidence base properly considers current and emerging office demand to ensure that the London Plan properly plans for anticipated need.
3. **Key areas** – The LPA supports in principle the identification of key areas to further prioritise commercial development and CAZ functions. These areas should include the whole of the City of London and most of the CAZ as currently designated. Policy support could include reference to allowing greater height / density in these locations. These areas should promote office and employment uses, not just leisure, culture and retail. Notwithstanding the creation of 'key areas', there should still be strong support for development of the whole of the CAZ, and any 'key areas' policy should not in practice result in the CAZ functions being focused and narrowed down to smaller areas.
4. **CAZ boundary** – The LPA recognises that changes to CAZ boundaries may be appropriate. That should include potential extension as well as reduction. Where areas are removed there should be a robust assessment into the economic impact (including potential for growth), with areas which can contribute to economic growth being retained within the boundary. In more peripheral areas (whether removed from CAZ or not) there should be policy support for redundant office buildings to change to a range of appropriate uses, including hotels, PBSA,

⁴ Global Cities Survey, London Property Alliance/Centre for London, March 2025

⁵ <https://www.knightfrank.com/research/article/2025-02-11-unlocking-london-shiftingbehaviours-emerging-opportunities>

co-living etc; not just residential. This could be supported by a more detailed evidence base regarding the nature of building redundancy and vacancy for office buildings. On top of the overall levels of office vacancy, this evidence base could use the recording of other metrics such as environmental performance, transport connectivity and vacancy duration to helpfully guide the creation of appropriate policies. These measures would all help to make the best use of the very limited available land in valuable parts of London by reducing overall building vacancy levels and instead allowing those sites to accommodate more suitable uses. We are currently conducting analysis into secondary office stock across the CAZ and would appreciate the opportunity to share our findings with you as they emerge, which would help inform this important debate.

5. **Mixed use buildings within the CAZ** – As a result of historic land use policy, the CAZ (generally, outside of the City of London) has commercial buildings that include an element of residential floorspace. Often, this residential floorspace is let on a short term basis. Under the Building Safety Act such buildings, where they exceed 18m and contain two or more units, are treated as Higher Risk Buildings, which brings them into the scope of the Gateway process. The regulatory and fire safety requirements for mixed use buildings of this nature are highly complex and uncertain. This can make retrofitting commercial buildings that contain residential, or extending them, to realise additional commercial capacity, very challenging. It acts as a significant disincentive. This is a significant – but new – regulatory constraint. LPA suggests that, where existing residential within a mixed use building is posing a significant constraint on site optimisation for commercial uses, the new London Plan addresses this. This should include allowing for the relocation of residential, and for its replacement by commercial uses where doing so would still contribute to the mixed use character of the CAZ or strategic approaches to residential provision, such as financial contributions.
6. **Affordable workspace** – The LPA's comments in respect of affordable workspace are detailed below.

3.2 **Specialist clusters of economic activity**

1. Economic clusters such as the life science hubs of the Knowledge Quarter and MedCity are key to the Mayor's plan to grow the economy and boost productivity. Consideration should be given to how planning policy could better support these innovation centres, enabling existing and emerging clusters to realise their full potential. In our report, *London's Knowledge Clusters: From emerging to maturing* (2023) the LPA recommends that in order to grow London's life science sector, the capital needs a city-led strategic approach to planning policy and decisions⁶.

3.6 **Town centres and high streets**

1. **Diversified role of town centres** – The LPA supports the principle of the London Plan supporting a flexible approach to the range of businesses within town centres, which we assume would include International Centres and the West End Retail and Leisure Special Policy Area. Many modern day occupiers, particularly those in retail and hospitality, transcend use class boundaries and so greater diversity in this respect would be welcome.
2. **Re-provision of spaces** – Any requirements for development to specifically replace lost facilities, such as artists' studios, maker space or social or community infrastructure need to be carefully considered and ensure that they do not effectively act as policies to protect existing tenants. Whilst it is accepted that there may be protection for some uses in certain instances,

⁶ London's Knowledge Clusters: From emerging to maturing, London Property Alliance/Future Places Studio, 2023.

this needs to be tempered against ensuring that places can meet market demand and accommodate the right uses/occupiers. For any uses which are protected, this should be justified by a need for such uses. We would encourage the use of land use swaps.

3. **Design requirements** – Any design policies in the London Plan relating to ground floors of buildings or active frontages should be provided as guidelines/aspirations rather than strict requirements. In some instances, there will be a need to make spaces which have been designed with one user in mind and incorporating too much flexibility could dilute these products.

3.5 London's night-time economy

1. **Clusters** – The identification of night-time activity clusters in the CAZ and town centres would be a way of supporting growth of night-time industries in these locations, particularly very late and intensive night-time uses. It should be made clear that such uses would also be supported in principle in other areas of the CAZ which also contribute to central London's wider offering, as well as in instances where there is an identified need in a specific location. Ensuring a variety of cultural and leisure uses across the CAZ is critical to its success and this should not be diluted only to smaller clusters.

3.7 Visitor economy

1. **Purpose built visitor accommodation** – The LPA strongly supports the potential extended support of purpose-built visitor accommodation more widely across the CAZ, in town centres and high streets and more broadly in other locations with good public transport accessibility. Demand for hotel rooms and other short-stay accommodation in central London is high⁷ and ensuring that there is sufficient visitor accommodation is essential for London's global city status. We suggest that outside of these defined areas, flexibility is still maintained for appropriate schemes to come forward, where these can be demonstrated to be acceptable. This is particularly relevant for some areas of the CAZ which may be re-designated following the potential boundary amendments.
2. Strategic and local policy should ensure that it remains sufficiently flexible to allow for the loss, replacement, or upgrading of sub-standard legacy hotel accommodation, especially when it detracts from the character and amenity of surrounding areas.

3.8 Digital infrastructure

1. **Capacity** – The LPA agrees that digital infrastructure is critical to London's success. Any utility planning and delivery should be led and carried out by the relevant infrastructure provider and explicitly supported in principle by the Mayor. Such provision should ensure that London can meet its development goals.

3.9 Access to employment

1. **Employment opportunities** – Developments provide an excellent opportunity to provide greater access to employment opportunities for Londoners, both during construction and in operation, and this should be encouraged. This is needed to enable development in the capital and ensure the next generation of skilled recruits into the sector. This has to come alongside ensuring that developers can secure the right teams to build out and operate developments as quickly as possible. The LPA strongly supports greater collaboration on employment opportunities between boroughs, including the principle of a London-wide brokering agreement.

⁷ City Of London Visitor Accommodation Sector Commercial Needs Study, City of London/Avison Young, January 2023

In many local authorities, the current processes do not perform well and the LPA supports the GLA having a more co-ordinated approach. This is an area in which it is essential that London Plan policy leads to simplification and standardisation, and a reduction rather than increase in the burden on development. In some cases, employment and training requirements arising from planning decisions are over-complex.

3.10 Affordable workspace

Page | 10

1. **Principle** – The LPA remains of the view that policy intervention in respect of low cost and affordable business space is not necessary or appropriate within core/established markets to achieve the strategic priorities of the CAZ. Unlike housing, there are areas of low-cost office accommodation within the CAZ and beyond. There is also a demand centrally for serviced office space which provides cost effective accommodation for SMEs. The diverse nature of the CAZ's multiple, varied, office markets make "one size fits all" strategic policies on low cost and affordable workspace inappropriate.
2. Accordingly, low cost and affordable business space are matters that would be more appropriately dealt with through local plans. Such policies should only be introduced by the boroughs where there is locally specific evidence that shows a need for policy intervention in order to address evidenced market failures. This approach would ensure that such policies can only be introduced where there is a clear evidence base, tested through a local plan examination.
3. There is no market failure within the CAZ, which would require such detailed, interventionist policies which are actually likely to undermine the strategic priorities of the CAZ. The office and housing markets are not comparable and the office market does not exhibit the housing market's symptoms of chronic and worsening affordability.
4. If a more local level approach was taken, proper account of the office submarkets in the CAZ, and other parts of London, and the nuances that they generate can be addressed in Local Plan policies. We note that even within the relatively small CAZ area, office rents across the submarkets vary considerably and therefore the provision of affordable or low-cost workspace within these sub-markets can have a large impact on; achieving policy objectives of the CAZ policies, scheme design; and scheme viability.
5. Specifically in respect of low-cost business space, the LPA strongly believes that low-cost business space should only be protected where this is provided for in detailed, local policies comprehensively tested through the local plan process. These should explain where protection is "appropriate" and identify the "shortages of lower-cost space". This is important given the various submarkets, particularly in the CAZ.
6. Our preferred approach would, therefore, be for these matters to be addressed in local plans, not strategic policy.
7. The LPA would welcome the opportunity to provide further evidence of the diversity of the CAZ office market, associated rental values in the core CAZ markets of the Square Mile and the West End, the cyclical nature of the office market and the requirement for headquarter office buildings.
8. **Uses** – It is suggested that the London Plan could apply affordable workspace requirements to a wider range of uses, including commercial, business and service uses (Class E) and a wider range of cultural and community uses. The LPA strongly objects to this suggestion.

9. Requiring affordable workspace (i.e. subsidised workspace) on these uses would place an additional financial burden on those paying the subsidy and could result in less of these uses coming forward. In some cases (not all), developers seek to introduce non-office commercial uses (such as retail, restaurants, drinking establishments, cultural, community uses etc.), not necessarily as profit-drivers but to add a 'sense of place'. Even where these uses are profit-generating, their value in terms of providing diversity to streetscapes and communities should not be underestimated. London's global city status, particularly in the CAZ, relies heavily on a diverse mix of uses and planning policies should not discourage this.
10. This will also create significant additional complexity and cost on developers, and occupiers, trying to introduce such uses.
11. **Delivery** – The LPA supports the suggestion of flexibility in the provision of affordable workspace including coordinated provision, off-site provision and financial contributions and LPA supports *BusinessLDN's* recommendation on this in its analysis of affordable workspace in its *Delivering Affordable Workspace in London (2022)* paper. Affordable workspace may not always be appropriate or maximised on-site and a coordinated approach to provision could result in better quality, purpose provided space provided elsewhere. We would encourage this consolidation to apply cross-borough i.e. so that the affordable workspace does not necessarily have to be provided within the same borough as the development to which it relates. It is important that the London Plan incorporates flexibility to encourage commercial growth within the capital.
12. **Consistent affordable workspace policy** – The LPA strongly objects to suggestions of a London-wide consistent affordable workspace policy. In principle, this is for the reasons outlined above namely that the LPA considers that this should be a matter for the boroughs to evidence and plan for. A uniform granular policy would not be able to take into account local market variation and economic need/context and risks adversely affecting economic growth in the capital. This is at odds with the strategic objective of the Plan to unlock economic growth.
13. Should an affordable workspace policy within the London Plan be progressed, we suggest that this set out a high-level strategic framework for where affordable workspace policies may be appropriate (for commercial office use only), with a requirement that any policy be brought forward at a local level and based on evidential need and considers impact upon the local economy. A policy could also encourage more innovative uses of space to encourage a range of different uses/occupiers within the same site. For example, Somerset House is a good example of where a flexible approach to planning has enabled a range of creative office workspaces to thrive.

4.1 Building height and scale

1. **In principle heights/minimum height benchmark** – Building at greater densities across London should be strongly encouraged and will be key to London meeting its housing and growth targets. This approach is in line with the NPPF which states that where there is an existing/anticipated shortage of land for meeting housing need, it is especially important that homes are not built at low densities (para 130). Para 135 goes on to state that planning policies and decisions should ensure that developments (not just housing) should "optimise the potential of the site". The LPA therefore strongly support the Mayor's direction to increase the density of housing developments. This direction should explicitly be widened to support density of commercial development as well, as achieving the 880,000 dwellings annual delivery target will put greater pressure on existing land supply and higher commercial densities will be needed to meet identified growth needs.

2. The suggestion that the London Plan could include an in principle building height across London (split into character areas) could, in some instances, encourage building at greater density. So too could a minimum height benchmark, which we would argue should apply to all development, not just small sites. Should these suggestions be brought forward, we would caution against any policy being drafted to effectively act as a 'maximum' default on building heights. Central London, particularly Westminster and the City of London, are home to a substantial number of listed buildings and nationally significant heritage assets. Often, justifying additional height in the context of heritage constraints relies on site specifics and intelligent, excellent architecture which can respond to the local context. Our concern is that a blanket 'minimum' or 'principle' height would be developed in isolation of any scheme specifics and therefore would need to be unambitious in respect of potential heights. If such a policy is progressed, it should be made clear that such heights are a starting point only, and if additional height can be appropriately justified then such applications should be approved.
3. **Small site design code** – Given the unique nature of central London, the LPA is unconvinced that a small site design code would help support small site development and SMEs. As per the above points, the concern is that anything prepared on a London-wide basis would be too generic to be applied to a central London context and ultimately could 'water down' true development potential of sites. What would be more helpful would be if the London Plan could provide strong strategic direction for boroughs to make the best use of land, take a permissive approach to innovative building design (including to building height) and giving substantial weight to the value of using suitable brownfield land, as per para 125(c) of the NPPF.

4.2 Tall buildings

1. **Tall building policy** – In order to support the Mayor's key objectives it is important that the London Plan's tall building policy is appropriately framed to encourage the optimisation of sites, including through utilising well designed tall buildings where appropriate. The LPA broadly supports a London-wide tall building policy framework, which encourages tall building development across London and provides a framework for boroughs to bring forward relevant policies in their local plans. As a general principle, the LPA considers that the broad structure of Policy D9 in the London Plan works well, albeit the current wording is too restrictive - part (B) in particular should be amended to reduce its rigidity. Identifying explicit tall building areas and contour heights via a plan-led process (i.e. in isolation of the detail of specific, individual developments), has the potential to undercut the amount of development which could come forward. Whilst it is agreed that there should be a cohesive and co-ordinated approach to the placement and clustering of tall buildings, this should be flexible enough to adapt to evolving contexts and local needs. We would instead suggest that the London Plan's tall building policy outlines at a strategic level where boroughs should consider that tall buildings are appropriate. An overarching statement supporting the principle of tall buildings, unless the harm outweighs benefits, would be helpful. It is important that the London Plan provides strong support for appropriate tall buildings if brownfield land is to be utilised effectively in line with other core principles which underpin the strategy behind regional policy in London. Importantly,

Should the GLA consider that tall building locations do need to be identified (either at a GLA or a borough level), the identification of such areas should not be considered a 'gateway' to assessing the impacts of tall buildings and allowing balanced planning judgements to be made on sites which fall outside of designated areas.

2. **Tall building clusters** – As noted above, the LPA considers that the London Plan would be best placed providing strategic guidance for boroughs on the types of location where tall

buildings may be appropriate, but not requiring a strict plan-led approach to areas or contour heights.

Should it be considered necessary for clusters to be identified, the LPA considers that this would be a matter best dealt with at borough level. There should be flexibility incorporated into policies, to ensure that such clusters do not effectively act as a constraint on future growth and can evolve with changing needs. Setting these policies at a local level enables more detailed assessments to be carried out to better inform local approaches. Our concern is that designations at a strategic level may 'miss' areas or undermine the potential of some locations. It is important that any policy relating to tall building clusters does not preclude tall buildings coming forward outside of these areas, where this can be justified.

3. Should the London Plan take a more active role in identifying and defining tall building clusters across London, this needs to not act as a barrier to development and growth either through (a) restricting buildings within clusters to a set maximum height; or (b) restricting areas where tall buildings can come forward. Any policy would also need to be future proofed to be able to evolve to changing contexts. As set out above, London needs to densify if it is to meet its housing and growth targets and it is vital that the London Plan's tall building policy supports this growth and densification. Given the excellent transport connections and importance for London and nationally, the London Plan should in particular require higher densities across Opportunity Areas and the CAZ, taking into account other relevant planning considerations.
4. **Tall buildings outside of defined clusters** – The LPA feels strongly that any London Plan policy which comes forward should enable opportunities for tall building sites to come forward outside of identified tall building clusters. Environments evolve quicker than planning policy is able to, and there may be justifiable instances for sites outside of identified clusters to accommodate additional height. If the Mayor is to meet his housing and growth objectives, all these opportunities will need to be maximised. Any sites which fall outside of clusters could have additional policy criteria to satisfy, with the starting point being that the principle of the acceptability of sites accommodating a tall building should first be considered positively. This would be in line with the NPPF's requirements for sites to be optimised.
5. **LVMF** – There is reference within the Towards a New London Plan document to the GLA updating the London View Management Guidance. In updating this guidance, the LPA urges the GLA to ensure that it does not act as a barrier to growth/density and that the updated guidance is consulted upon.
6. **Tall building definition** – LPA also emphasises the importance of ensuring tall buildings are appropriately defined having regard to local context. Many buildings in the CAZ, outside of the City of London tall building cluster, are still in excess of 21m or even 30m, being six to eight floors, but would not be conventionally considered to be tall buildings given the context of central London. The definition applied to tall buildings should be carefully considered to ensure that proposals for buildings that are contextual and of similar height and scale to adjacent buildings are not subject to locational and assessment criteria intended to be applicable to very tall buildings or buildings that are clearly of a substantially different height and scale to their surrounding area, to ensure proposals for larger buildings in central London are not inadvertently subject to tall building policy. If this would occur it would create a barrier to, rather than support, site optimisation.

4.3 Supporting a denser London linked to transport connectivity

1. The LPA supports in principle the development of a new connectivity metric to complement PTAL to help inform the approach to densities, building heights and scale. While PTAL has been

a useful tool, it oversimplifies accessibility by focusing primarily on proximity to transport nodes, without fully capturing journey times, multi-modal options, or the quality and frequency of services. The LPA agrees that higher densities in London should be linked to transport connectivity and therefore supports the progression towards a more comprehensive tool. This new metric should build upon, rather than replace, the existing PTAL tool, addressing its current limitations. The LPA emphasises the importance of ensuring this new connectivity measure is properly evidenced, developed transparently, and subject to regular updates and consultation. The LPA would welcome the opportunity to engage in this process to ensure the tool meets the growing needs of the city.

2. **Improvements to transport infrastructure** – As a general point, the LPA strongly supports investment in and improvements to transport infrastructure across the capital, with almost 200,000 new office jobs delivered in the local authorities served by Elizabeth line stations in central London during the last five years, representing just over 70% of the change in office employment across London⁸. Delivering effective, efficient and sustainable transport infrastructure will be key to unlocking densities and delivering residential and economic growth.

4.4 London's heritage

1. **Adaptation and retrofit** – The LPA strongly support the introduction of a new policy supporting the sensitive adaptation and retrofit of historic buildings. In 2021 the WPA prepared a paper '*Zero Carbon Westminster: A Focus on Retrofit in Historic Buildings*' which covered this topic. Westminster has the UK's largest number of listed buildings and the second highest concentration of any local authority. Westminster's historic buildings, a key part of its character and identity, need to be sensitively adapted. This will not only ensure these special places are resilient to climate change but will also enable the emissions reductions we need whilst preserving our history.
2. Enabling sensitive adaptation and retrofit for historic buildings is in line with national policy for plans to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF, para 203). The pursuit of creative approaches to adapting historic buildings to ensure investment in their long-term conservation should be encouraged.
3. The London Plan should emphasise the importance of ensuring sufficient weight is given to reducing energy use and carbon emissions from listed buildings and heritage assets.

4.6 Heat risk, ventilation and overheating

1. The LPA supports measures to reduce overheating in homes but acknowledges that there is currently an inconsistency between the London Plan requirements and the requirements set out in national Building Regulations. Noting the introduction of Part O (Overheating) of the Building Regulations in 2021, the LPA supports the proposed removal of bespoke policies within the London Plan in favour of national Building Regulations to deal with ventilation and overheating on this basis to ensure consistency.
2. The LPA also supports the suggested clarification on circumstances when single aspect homes might be appropriate to reduce delays and additional costs.

⁸ The Crossrail Effect How The Elizabeth Line Is Transforming The Capital.

5.1 Energy efficiency standards

1. The LPA agrees with the assertion that the implementation of energy policies should be streamlined and should use assessments and measures that are already well understood by industry to avoid unnecessary delay and cost. The potential unintended impacts of introducing measures which differ from other regulations and policies being brought forward elsewhere, for example at a national level, should also be considered for the same reasons.
2. Currently, carbon emissions are calculated as a reduction against Part L of the Building Regulations i.e., major development is required to achieve at least a 35% reduction against Part L with the remainder offset through a financial contribution to reach 100%.
3. The LPA would support a review of the energy efficiency measures secured in planning policy and recognises that several London boroughs are moving towards an Energy Use Intensity approach, which calculates the total amount of energy used in a building in a year divided by its floor area. However, the LPA notes that any change in measurement in the London Plan could result in a greater number of instances where applicants are required to undertake both Part L and EUI calculations, which has the potential to become an unnecessary barrier to development, if this approach is not supported by forthcoming changes to Part L.
4. The LPA would not support a reduction in the threshold to which carbon emissions reduction policies would apply without further research demonstrating the impact this would have on reducing carbon emissions and delivering viable development.
5. The LPA supports the suggestion that any standards should be set at an achievable level that also drives continued performance improvements in the operation of buildings, considered alongside whole life carbon emissions reduction. The LPA suggests that, regardless of the measurement approach, both minimum standards and aspirational targets are set with additional weight given to schemes which meet or exceed the aspirational targets.
6. The LPA also suggests that the London Plan engage with the topic of carbon offset contributions. The pricing of carbon offsetting should be tested and rigorously evidenced to ensure the rates are justified. At present, many organisations and developers offset their carbon emissions as a result of their own corporate commitments through carbon offset funds. These cannot be taken into account when considering the requirement to offset carbon emissions against Part L performance secured through s106 agreements. The effect of this is that in some cases emissions are being offset twice. We suggest that the London Plan consider how offsets from planning decisions are best secured and how these can be coordinated with other offset funds that may exist to support carbon reductions at scale. Greater collaboration between boroughs, applicants and other stakeholders will help to maximise the benefits achieved from the implementation of carbon offsetting contributions.

5.2 Heat networks

1. The LPA supports the removal of duplication with national requirements in respect of heat networks. The LPA also supports provisions seeking the capture of waste heat from significant, feasible sources for new networks or in support of the decarbonisation of existing heat networks. It is not considered reasonable, however, for such provisions to require the development of heat networks beyond the boundary of a development where none already exists.

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

1. The LPA supports measures to reduce the carbon associated with development in London and nationally. The LPA recognises that one way to reduce carbon emissions is to focus development and redevelopment on brownfield sites, which is recognised by the National Planning Policy Framework – in particular Paragraph 125 which gives substantial weight to the value of using suitable brownfield land for homes and other identified needs.
2. The LPA has long advocated for a consistent approach to whole life-cycle carbon and the circular economy, noting the challenges posed by the local varied approaches in place across London, including our research on this issue by JLL, *Retrofit First, Not Retrofit Only: A focus on the retrofit and redevelopment of 20th century buildings*.⁹ It is important that the new London Plan encourages a 'retrofit, first not retrofit only' approach to planning policy and decision-making across London boroughs, enabling demolition when and where redevelopment is most appropriate in delivering on the Mayor's growth objectives and in line with the requirements of the NPPF. A 'retrofit first' rather than 'retrofit only' approach to delivering Net Zero Carbon buildings should be communicated clearly to all stakeholders.
3. The LPA supports the use of objective sustainability targets (kgco2e/sqm limits) consistently across London, rather than fragmented and subjective policies. Targets should also factor in both embodied and whole life carbon impacts in line with the recommendations in our report, *Retrofit First, Not Retrofit Only: A focus on the retrofit and redevelopment of 20th century buildings*, for determining when development is and is not acceptable. We believe a more sophisticated and holistic approach to understanding a building's impact on the environment over the longer term, weighted with the economic and whole life carbon saving that a modern, sustainable building would deliver, will better support innovation and promote best practice in environmental standards. Standardised targets will need to be carefully assessed prior to adoption, whilst providing a degree of flexibility to boroughs so they can balance a range of factors to support schemes which deliver significant public benefit and deliver other planning policy requirements.
4. It is essential that, in doing so, the ability to innovate, change and, where necessary, replace buildings, essentially on scarce brownfield land, is retained. Policy that is overly complex or locally varied can discourage investment and our members' experience is that it has added significantly to the complexity and cost of planning applications.
5. The LPA would support the London Plan setting out what types of premises are needed to keep materials out of the waste stream and support circular economy principles on the understanding that these types of developments would be supported in principle¹⁰. The GLA's position as a strategic authority overseeing Greater London should be optimised to maximise the redistribution of materials between developments taking place between different boroughs to support the circular economy.

⁹ Retrofit First, Not Retrofit Only: A focus on the retrofit and redevelopment of 20th century buildings, London Property Alliance/JLL 2022

¹⁰ Retrofit First, Not Retrofit Only: A focus on the retrofit and redevelopment of 20th century buildings, London Property Alliance/JLL 2022

5.7 Green infrastructure and biodiversity

1. **Urban Greening Factor** – The LPA would not support widening the Urban Greening Factor (“UGF”) requirements to other development types. Applying this to smaller developments or changes of use, for example, could cause barriers to such development coming forward. This is particularly the case in a central London context where opportunities to maximise greening are limited and need to be considered against other space-taking requirements to meet policy and operational requirements. The recently introduced Biodiversity Net Gain regulations already achieve many of the same aims as UGF policies, including for smaller sites.
2. If the London Plan is seeking to reduce policy burden and enable growth, we would urge that the UGF policy be considered to incorporate flexibility for where targets cannot be met, and where this is justified. We also suggest that the calculation for the target is based on areas within the building footprint only. Some sites include areas of hard standing/roads within their red line which artificially raise the target. Basing the calculation on areas within the building footprint would be more representative. It would be beneficial if areas outside of this footprint could however still contribute to meeting those targets.

Page | 17

5.10 Flood risk management

1. **Greenfield Runoff Rates** – There is suggestion that the London Plan could require new development to achieve GRR, off-site provision where this could not be met on site and the use of permeable surfaces. The LPA strongly objects to these requirements. GRR should be an aspirational target to be achieved, where feasible and considering other policy objectives, including carbon impacts. Often, achieving GRR requires the construction of Sustainable Urban Drainage Systems (SuDS) which can be sizeable on larger schemes. These can result in a significant carbon spend, so this should be considered and balanced against the benefits of achieving GRR. In other instances, e.g. retrofitting buildings, constructing SuDS or implementing other GRR methods will not be achievable. Whilst off-site solutions could be encouraged, we are unsure how these would directly mitigate the effects of a development and therefore we would argue that such provisions would be unjustified.

5.14 Car parking, cycle parking and deliveries

1. Cycle parking – The LPA strongly supports the upcoming review of the London Plan cycle parking standards. The CPA has been in close discussion with TfL in respect of cycle parking standards as they apply to the City of London specifically. The CPA’s Study, ‘Cycling & the City’ (December 2024)¹¹ demonstrates how an over-provision of cycle parking spaces in the City has in some instances led to a high carbon impact and under-used space. In an environment where all stakeholders are working to reduce carbon spend, maximise building efficiency and provide sustainable, well-designed new places, the existing London Plan cycle parking standards often do not perform well.
2. The *Cycling and the City* report provides clear evidence that an alternative approach to cycle parking standards as set out within the London Plan (2021) is needed for the City of London. To summarise:
 - a) Cycle parking policy for City of London offices should be updated to reflect a target cycle mode share of circa 11%, rather than the existing 19% target. This would more accurately reflect the detailed review, survey and analysis contained within the *Cycling and the City*

¹¹ **Cycling & the City**, City Property Association, December 2024

report. TfL recognised commutes of 10km and under as potentially cyclable and this distance should be used to inform an achievable cycle mode share in the City of London.

- b) Cycle standards should be based on Net Internal Area (NIA), not Gross External Area (GEA). With GEA, plant space and even the area required for cycle parking itself generates a requirement for further cycle parking, because cycle parking space is captured within the GEA measure of a building. Cycle parking provision should be correlated to the actual occupational density of buildings, and NIA is the appropriate metric for this. NIA is the area usually occupied by office workers and is a more robust indicator of the number of employees using a building. In addition, the cycle parking standards for the City of London should also be based on a more plausible occupational density assumption. The current London Plan's occupational density assumption is 1 employee per 12sqm GEA (equivalent to 1 employee per 8sqm NIA). The *Cycling and the City* report substantiates why the density that should be applied in the City of London is 1 employee per 15sqm NIA. This represents a considered balance between the current British Council of Offices standard of 1 employee per 12.5sqm and the results of the report survey which demonstrated an average occupational density of 1 employee per 21 sqm NIA.
 - c) Policy should give more emphasis to the size and functional operation of facilities, rather than setting policy that focusses purely on the quantum of cycle parking. Greater flexibility on cycle parking types should be encouraged, as well as consideration for evolving requirements such as e-bike storage and charging, enhanced arrival experience and cycle promotion plans. It is recommended that monitoring regimes are put in place, secured through Cycle Promotion Plans, which would enable cycle parking usage to be reviewed annually. This could allow meanwhile uses to occupy vacant spaces and provide meaningful uses and if cycle parking demand was to increase then the building owner would be obliged to provide additional storage with associated facilities. It is recommended that office cycle parking policy is updated to allow cycle parking volumes to be phased in with demand, governed by annual monitoring and secured through cycle promotion plans. In respect of points (1) and (2) above, based on an occupancy of 1:15sqm NIA, an 11% cycling mode share would equate to a cycle parking standard of 1 cycle parking space per 136 sqm NIA.
3. Whilst this report is focused solely on the City of London, it demonstrates that there is significant variation across London in terms of the impact of the cycle parking requirements, even where there is a definition of a 'higher cycle parking' area and the rest of London. The London Plan should take a strategic approach to the provision of cycle parking, requiring boroughs to set standards which support the Mayor's objectives for sustainable travel and net zero. The LPA considers that specific standards (in terms of numbers) should be set at a local borough level, rather than a London-wide basis. Policy should give more emphasis to the size and functional operation of facilities, to ensure that where facilities are provided these are being best utilised. Reference within any policy should be made to boroughs providing for a range of cycle parking type provision, including evolving requirements such as e-bike storage and charging and enhanced arrival experience. We also suggest that policy encourages the use of Cycle Promotion Plans, which could be used to review cycle parking usage to be reviewed annually. Providing landlords/owners are encouraging cycle promotion, any use of the residual unutilised space should be entirely at their discretion.

5.16 Fire safety

1. **Fire safety policy** – The LPA supports the proposal to remove the overlap between London Plan policies and national building regulations in respect of fire safety. It is imperative that safe buildings and places are created in London, but there must be clarity on this provided at a national level. In addition, the implications of developments accommodating the additional fire

safety requirements which have rightly been enacted during recent years must also be considered in relation to other areas of policy, to ensure the ambitious level of housing and other development which the Mayor aims to deliver is achieved. The requirement for additional staircases to be provided in some buildings requires otherwise usable floor space is one example of such a factor. This means there is great importance attached to ensuring that those policies governing design, density, growth and the intensification of land most suited to accommodating development are carefully considered.

5.17 Air quality

1. **Air quality positive** – The current London Plan seeks for large-scale development proposals subject to an EIA to consider how local air quality can be improved as part of an air quality positive approach.
2. The Towards a New London Plan refers to “benchmarks” and “requirements” for “larger proposals”. The LPA would strongly caution against an approach which introduces binary air quality improvement targets for development. The LPA supports the overarching principle to improve London’s air quality. However, this task is not the sole responsibility of development. Indeed, often the ability for schemes to improve local air quality is hampered by local conditions outside of the developer’s control notwithstanding measures which can be incorporated within the red line site boundary. It also must be recognised that growth will in some instances result in emissions/air pollution. Where these effects are generated, it is for the planning officer to judge a scheme in its entirety, coming to a balanced judgement.
3. It is important that the London Plan does not place additional unrealistic requirements upon development which could be difficult or impossible to meet. The LPA would support an aspirational approach to air quality positive for larger developments, but strongly urge the GLA not to pursue a binary requirement.
4. **Air pollution sources** – There is reference to the introduction of “requirements” for certain construction sites to have connection to mains power to reduce the need to use polluting generators” (our emphasis). Whilst this would obviously be preferred from an air pollution perspective, it must be acknowledged that in some instances this will not be feasible nor practical to achieve. London Plan policy should set out the strategic framework that connections to mains power for construction sites should be considered, and progressed if feasible, but this should not be set as a binary policy requirement. Doing so could cause delays for sites coming forward, particularly for the early stages of construction. We are mindful of the Government’s push for developers to get building, and there must be the framework in place to enable that to happen.