

Real Estate:UK Response to the Draft London Plan Consultation

Prepared and submitted by
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Real Estate:UK

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We support thriving communities across the UK through the homes, workplaces, critical infrastructure such as logistics and data centres, and retail and leisure centres our members build, maintain and operate.

Introduction

RE:UK welcomes the opportunity to respond to the Draft London Plan. We have set out our overarching comments and addressed the chapters and policies most relevant to the delivery of homes, employment space and infrastructure.

We welcome the effort to simplify the Plan and its stronger recognition of industrial and logistics land needs. The test of the final Plan will be whether its housing and employment ambitions can be delivered alongside its affordable housing, design, environmental and infrastructure requirements. We ask the Greater London Authority (GLA) to make the evidence and delivery assumptions clear and to engage further with the sector as the Plan is finalised.

General comments

Housing need and ambition: We recognise the difficult conditions in which the GLA has set a proposed target of approximately 558,000 homes over 10 years, however, establishing a target grounded in deliverable capacity is important. At the same time, the proposed figure is materially below identified need. As one of the first in a new generation of spatial development strategies, the London Plan will be influential well beyond London. We are concerned that the Draft Plan therefore represents a missed opportunity to set a more ambitious direction for housing delivery in London. While we recognise the significant viability

and capacity constraints facing the market, the scale of London's housing crisis requires the Plan not simply to reflect current constraints but to set out a credible strategy for overcoming them.

We would therefore welcome a clearer and more ambitious pathway towards meeting London's housing need. The final Plan should explain the scale and reasons for the gap between need and planned delivery, the options considered for accommodating more growth, and the infrastructure and other measures that could enable the target to increase over time. It should also demonstrate how the proposed target itself can be delivered.

Greater clarity on the relationship between the proposed borough targets and the national standard method would be helpful. Relatively few borough targets appear to reach the figures generated by the method. We encourage the GLA to publish a clear reconciliation of identified need, standard-method figures, London-specific constraints and assumed capacity in each borough. This is particularly relevant given the decline in housing starts and the limited pipeline of new schemes. Current completions often reflect schemes started years ago and may not yet reveal the full effect of the slowdown.

Viability and the cumulative cost of policies: The Plan's delivery will depend on how its requirements work together in practice. We encourage the GLA to test affordable housing, sustainability and energy standards, infrastructure contributions and other obligations cumulatively against current market conditions and a range of development models. Further detail on how the viability evidence captures these combined costs would give greater confidence in the Plan's delivery. It is important that a robust and transparent evidence base is published sufficiently in advance of the Examination in Public to allow proper scrutiny and engagement. Without this, there is a risk that questions will remain over whether the Plan's requirements are realistically deliverable. The final Plan should also clarify how affordable housing, essential infrastructure and economic growth can be balanced where all requirements cannot be met in full, with evidence-led flexibility to support viable schemes.

This assessment should also recognise the cumulative cost of the planning process itself. Additional evidence requirements, negotiations and conditions can increase professional fees, delay decisions and create uncertainty that affects funding and investment, while placing further demands on borough resources. Simplification should therefore reduce duplication and make clear which matters have already been settled through the development plan or other regulatory processes, alongside testing the direct financial cost of policy requirements.

Connecting homes, jobs and infrastructure: There is an opportunity to make the relationship between the housing and economic growth chapters more explicit. Businesses need suitable space and access to a workforce; that workforce needs homes across a range of tenures, including market rental options. Additionally, the Plan could give clearer recognition to offices and other employment development alongside industrial and logistics uses. Housing and employment growth also depend on transport, utilities and other

infrastructure. Where the proposed distribution of growth relies on major transport schemes, borough cooperation or land assembly, setting out the relevant dependencies, funding and likely timing would strengthen the delivery strategy.

A strategic spatial plan aligned with national policy: The London Plan will set an important precedent for the next generation of spatial development strategies. We encourage the GLA to focus on the strategic choices, evidence and delivery mechanisms needed for homes, jobs and infrastructure, while allowing boroughs and individual proposals to respond to local circumstances. Some provisions may benefit from a lighter level of detail. The Plan should also distinguish more clearly between matters requiring strategic or local planning judgement and technical matters addressed through Building Regulations or consistent national standards, avoiding unnecessary duplication. Where an adopted allocation has established clear development parameters, these should provide greater certainty for compliant proposals, with subsequent assessment focused on matters still requiring determination and any material changes in circumstances.

It would also be helpful to explain how the approach aligns with national planning policy, particularly on housing need, Green Belt and growth around well-connected railway stations, and to clarify any differences. The relationship between the Draft Plan's 20-year horizon and the longer period discussed for SDSs would benefit from explanation. A clear approach to review would help the Plan respond to changes in markets, technology and employment patterns while maintaining investment certainty.

Simplicity and practical application: We welcome the shorter draft, the more explicit assessment of future industrial and logistics land requirements and the dedicated data centres policy. The reduction in the number of policies is a valuable step; its practical benefit will depend on how clearly the remaining requirements are expressed and applied together. Some passages and the optimisation framework would benefit from further clarification, as would the use of mapping at individual sites. Clearer drafting, accessible site-level mapping and visual examples would help applicants, boroughs and Londoners understand where and how growth is expected.

We support the move towards a shorter, more strategic Plan, consistent with the purpose of a spatial development strategy. Where we seek greater clarity or evidence in this response, this should not necessarily be interpreted as a request for additional policy wording within the Plan itself. In many cases, clearer supporting evidence, guidance, mapping or implementation material may be more appropriate, allowing the Plan itself to remain focused on genuinely strategic matters.

Flexibility and responsiveness to changing conditions: Given the length of the Plan period and the range of development models, locations and market conditions across London, flexibility should be a guiding principle in both policy design and implementation. Strategic policies should establish clear objectives without unnecessarily prescribing how they must be achieved in every circumstance. Where evidence demonstrates that a particular

requirement would prevent an otherwise sustainable and beneficial development from coming forward, there should be sufficient scope for a proportionate, evidence-led response. The Plan should also be capable of responding to material changes in economic, market and technological conditions over its lifetime.

Implementation and transition: We would welcome further detail on how boroughs and infrastructure providers will implement the Plan's strategic choices, particularly where delivery depends on local plan reviews or changes of land use. Effective implementation will also depend on securing sufficient buy-in from London boroughs, particularly where the Plan requires significant increases in housing delivery or difficult decisions on land use. The GLA should provide a clear and transparent evidence base for these strategic choices and work closely with boroughs on implementation, while retaining the ability of the London Plan to provide strong strategic direction where London-wide needs cannot be met through individual borough decisions alone.

A stable framework for investors and applicants, combined with a proportionate response to changing conditions, will be important. The transition from the current emergency housing measures also warrants careful consideration so that changes in requirements do not inadvertently disrupt schemes already being assembled or progressed.

Chapter 1: Overview of the Plan and Good Growth Objectives

The Good Growth objectives provide an important opportunity to establish how the Plan's strategic priorities should be balanced and applied in practice. We would welcome greater clarity on how these objectives should guide the interpretation of the individual policies that follow, particularly where different objectives or requirements may pull in different directions.

The commitment to avoid placing an excessive burden on development is particularly important and should be reflected consistently throughout the Plan. The Good Growth framework should recognise that successful delivery requires an appropriate balance between housing and employment growth, affordable housing, infrastructure, design and environmental objectives, with sufficient flexibility to respond to viability and individual site circumstances.

We welcome the Plan's acknowledgement of the significant viability challenges currently facing development in London. However, this recognition needs to flow through consistently into the policies themselves. There is a risk that the cumulative effect of additional policy requirements further constrains delivery in already challenging market conditions.

The objectives should also provide a clearer framework for coordinating homes, employment space, transport and utilities. This is particularly important where additional development depends on infrastructure investment or cooperation across borough boundaries.

The Plan should distinguish clearly between what the planning system can deliver and where public funding, infrastructure investment or direct intervention will also be required. This is particularly relevant to social and affordable housing, where Section 106 obligations alone are unlikely to bridge the gap between need and delivery, especially where smaller affordable housing packages can be difficult to transfer to registered providers.

We also support continued consideration of opportunities to increase housing capacity, including suitable public sector sites, estate regeneration and opportunities to make better use of some existing car parking land. These should be treated as opportunities subject to viability and individual site circumstances rather than as additional blanket requirements.

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

MBUL1 Spatial strategy

We support a strategic approach to directing growth and would welcome a clearer account of how the proposed pattern will be delivered. The Plan should identify the infrastructure, funding and borough action on which major housing and employment locations depend. It should explain how the brownfield-first approach will work in practice, with a clear explanation of the measures needed to realise it, and how the identified capacity relates to the circumstances in which other land may come forward.

The brownfield-first approach should also be explicitly cross-checked against MBUL2 and MBUL3 to ensure that the optimisation and tall-building frameworks do not inadvertently constrain the development capacity of brownfield sites. The different elements of the Plan should work together to maximise appropriate growth rather than impose parameters which suppress otherwise deliverable development.

The proposed housing distribution, including capacity associated with Green Belt locations and stations, needs transparent supporting assumptions. The GLA should test whether these expectations can be met given land assembly, infrastructure, market and local political constraints. The Plan should also explain how London's unmet needs will be considered with authorities outside Greater London. This is particularly important for industrial and logistics land, where not all identified need can be accommodated within the GLA boundary.

MBUL2 Optimising the use of land and site capacity

RE:UK is concerned that the proposed optimisation framework risks operating in practice as a return to a density matrix approach. Indicative heights and densities could be treated as de facto ceilings by decision-makers or objectors, potentially constraining otherwise appropriate development and cutting across the established design-led approach. This is particularly concerning for strategic sites capable of accommodating significant growth. Where indicative

density or height ranges are retained, they should be clearly expressed as minimum expectations rather than maximum parameters or ceilings, with a design-led approach used to determine appropriate site capacity.

The framework should make clear how its ranges are to be interpreted, which proposals it covers, and how site-specific design, operational and viability considerations can justify a different outcome. Its relationship with other design codes and masterplans should be readily understandable. This is particularly important in outer London, where a strategic framework should leave room for context- and design-led decisions while supporting the form of individual schemes to be determined on their merits.

The mapped Sustainable Access Measure should be easy to use at site level, including near the boundaries between categories. An interactive layer is available within the planning data map, but its location and use should be more obvious. The GLA should make the relevant layers prominent, explain how boundary cases will be handled and provide clear visual examples across different urban settings. The Plan should identify more suitable station locations for growth while ensuring that indicative densities are achievable in their context. The GLA should explain how it defines a well-connected station, including the role of service frequency and wider accessibility, and allow evidence to support greater density at suitable locations even where an indicative category or threshold suggests otherwise. In outer London, density expectations should be tested against demand for family housing, design quality, the cost of second staircases where required and scheme viability. Evidence from deliverable schemes would help establish where higher densities can be achieved.

Optimisation of industrial and commercial sites should take account of factors beyond additional floorspace. Operational efficiency, yard space, vehicle movements and the nature of the occupier's activity can make a single-storey scheme the most effective use of a site. Policy should recognise these different forms of intensification and allow the form of development to reflect operational needs.

MBUL3 Tall buildings

We ask for clearer illustrations of what the Plan's low-, mid- and tall-building categories would mean in different places. The Plan should explain how the categories in Figure 2.7 relate to the 18-metre building safety threshold and the resulting design and development choices. The GLA should examine whether the definitions leave unclear cases around that threshold and explain how the height categories interact with the optimisation framework. More visual material would help communities understand the proposed scale and form of growth, including the potential role of medium-rise development.

The identification of Metropolitan Tall Building Clusters should also allow greater flexibility in the scale and form of development that can comprise a cluster. An 'all or nothing' approach risks overlooking locations capable of accommodating significant additional development.

The GLA should consider allowing combinations of Metropolitan, very tall and other tall buildings where supported by context and design.

MBUL4 Utilities – capacity, connectivity, and resilience and MBUL5 Sustainable transport to enable London's growth

Utility capacity and strategic transport investment are fundamental to delivery. Electricity connection constraints and delays affect data centres and other large developments, including where network issues extend beyond one borough. The Plan should make clearer how strategic utility investment and the planning of growth will be coordinated. We also seek greater clarity on the status, timing and funding of the major transport schemes underpinning planned growth and the housing capacity that depends on them.

We welcome the clearer reference to extended, including 24-hour, delivery arrangements for relevant industrial, employment and town-centre uses. Operational requirements should be considered early so that any restrictions reflect the needs of the use and its surroundings.

MBUL6 High quality design for a growing, changing city

Good design must be applied with sufficient flexibility to support different development models and site conditions. Established industrial operations need protection as new sensitive uses come forward nearby. The agent-of-change principle should be expressed clearly and prominently in policy. The GLA should ensure that existing employment uses can continue to operate when surrounding areas change.

Chapter 3: Delivering the homes and neighbourhoods Londoners need

As the GLA's emergency measures to support homebuilding will not carry forward into the period covered by the new Plan, RE:UK urges the GLA to introduce appropriate transitional arrangements and retain flexibility through its implementation mechanisms. Although the Plan is intended to provide a framework for the next 20 years, its adoption will immediately affect schemes already in the pipeline.

This is particularly concerning given continued pressure on housing starts. RE:UK urges the GLA to retain the emergency measures until there is a clear and sustained recovery in starts, and to ensure the Plan can respond flexibly to future market fluctuations.

The GLA should also consider extending temporary CIL relief to PBSA schemes delivering affordable bedspaces, which are currently excluded from the emergency measures. This would help support affordable student accommodation alongside other forms of housing.

HN1 Increasing London's housing stock

RE:UK has consistently highlighted how viability challenges are constraining housing delivery, as reflected in the reduced target of 558,000 homes. While the Plan identifies capacity for 850,000 homes over the longer term, it is unclear how this additional capacity will be unlocked or what trajectory connects the two figures. Lowering the target acknowledges the challenge but does not address its underlying causes. The Plan misses an opportunity to set a more ambitious direction for housing delivery and tackle the barriers stalling development. RE:UK urges the GLA to set out a clear pathway to realising the longer-term capacity, supported by measures to improve viability and bring more homes forward.

The scale of the ask is also relevant. A ten-year target of 558,451 homes is around 55,800 a year, compared with a peak of around 40,000 completions in 2021/22 and a longer-term average that is significantly lower. The same is true of affordable housing: the draft aims to deliver 238,430 low-cost rent and 129,020 intermediate homes over the 10 years, or around 36,700 a year, whereas affordable completions have averaged around 10,000 to 11,000 a year over the last two decades. Given the current economic and geopolitical environment and weak demand, analysis available to RE:UK suggests that a significant upturn in starts in the short to medium term is unlikely without measures to support viability. The Plan therefore should set out what is needed to make these numbers deliverable.

RE:UK also asks for greater transparency on how the capacity-based borough targets in Table 3.1 were derived. Some boroughs carry very large targets, while others appear low relative to their potential. Publishing the methodology would help boroughs and the market understand how the targets were derived and provide a clearer basis for consultation.

The same transparency is needed on the underlying need. We urge the GLA to break down the overall housing need further, including an analysis of rental need. Without it, the tenure assumptions in HN3 and the size assumptions in HN7 cannot be fully tested, and it is difficult to judge whether the right mix of homes is being planned for.

The Plan links much of its longer-term capacity to major transport schemes. RE:UK therefore urges the GLA to set out the commitments behind each scheme and how many additional homes it would expect each transport improvement to deliver. The GLA should set out this capacity clearly and push for higher targets where the evidence supports it.

RE:UK also urges the GLA to place greater emphasis on unlocking land. This should include giving greater weight to estate regeneration schemes and public sector land, alongside opportunities such as retail and supermarket car parks and car parks held by transport providers, where owners are already considering development. These sites are often already in single ownership and in accessible locations, so they can come forward without the same reliance on private development and Section 106. The Plan should also quantify the potential contribution of suitable brownfield sites to housing delivery.

The Plan would also benefit from greater consideration of modern methods of construction (MMC) and proptech, which have the potential to increase capacity, accelerate delivery and unlock sites at scale. More broadly, the Plan should identify further practical measures that can help reduce delays and support the faster delivery of homes across London.

Finally, paragraphs 3.18 to 3.20 apply different ratios when counting non-standard forms of accommodation towards housing supply: 2.5 PBSA bedspaces to one home, 1:1 for older persons' non-self-contained accommodation and 1.8:1 for other non-self-contained accommodation. These ratios determine how much each type of accommodation contributes to borough targets, so they affect both delivery and land use decisions. RE:UK urges the GLA to publish the evidence underpinning these ratios and would welcome the opportunity for the sector to provide views on whether they are appropriate.

HN2 Protecting and reshaping housing

Estate regeneration, including schemes led by councils and Registered Providers (RPs), deserves clearer strategic recognition as a potential source of homes. These schemes can deliver additional homes on land that is already under public control, and can renew existing neighbourhoods at the same time. Any approach should reflect the practical need for viable schemes and appropriate local engagement.

RE:UK supports the fast-track route for estate regeneration in Part C and the intention to maximise additional affordable housing. As set out in our response to HN1, we would push for stronger recognition of estate regeneration and public land as sources of supply, so that the Plan does not depend so heavily on private development and Section 106.

The draft retains the requirement to replace existing social rent homes with at least the same amount of floorspace in the social rent tenure, irrespective of residents' rights of return, alongside the fast-track threshold of 50 per cent net additional affordable housing. RE:UK asks the GLA to test whether full like-for-like replacement and the 50 per cent threshold are viable together, including where residents choose not to return, so that the fast-track route remains usable in practice.

RE:UK also supports Part D, which supports modular temporary accommodation as a meanwhile use. Again, we would like the Plan to go further and define what counts as a meanwhile use or site. Without a definition, boroughs and applicants cannot tell when Part D applies or for how long, which makes it harder to Plan, finance and gain consent for temporary schemes.

It is also worth noting that households in temporary accommodation are not always eligible for social housing. RE:UK asks the GLA to consider how the Plan can better connect the two, so that temporary accommodation supports, rather than sits apart from, the delivery of social homes.

HN3 Delivering affordable housing

RE:UK supports the objective of delivering more affordable homes, but the thresholds need to be tested against current market conditions. Some schemes are already struggling to meet the temporary 20 per cent requirement, with 50 per cent CIL Relief, so 25 per cent in location band B and 35 per cent in band A with full CIL payment is a significant step up and unlikely to be deliverable for the foreseeable future. The GLA should publish clear assumptions and

illustrative appraisals across scheme types and locations, including the full package of policy costs.

On smaller schemes, RPs are often unwilling to acquire small on-site packages, and the Section 106 route has effectively stalled. RE:UK welcomes greater scope for payments in lieu and asks the GLA to make the route clearer and available to a wider range of schemes. It should examine a threshold of up to 50 homes, a presumption in favour of a payment for qualifying schemes and a transparent calculation that avoids a complex valuation exercise. This would also support SME developers, whose financing assumptions in the study are overly optimistic.

RE:UK asks the GLA to examine the evidence for its review regime. Open-ended obligations add risk for lenders and investors and could act as a handbrake on delivery. Reviews should be proportionate, should not apply where a scheme proceeds within the timescale assumed at permission, and should recognise both improvements and deteriorations in viability.

In particular, the GLA should review the case for late-stage viability reviews for Build to Rent (BTR) schemes, given the investment certainty required under forward-funded and joint venture models and the difficulty of assessing performance before a building has reached stabilised occupancy and rental levels.

The GLA also needs to recognise the additional viability challenges experienced by the BTR sector. BTR schemes are expected to deliver the same percentage of affordable housing as other developments, through Key Worker Living Rent (KWLR) and genuinely affordable Discount Market Rent (DMR), despite facing significant viability pressures and being unable to access grant funding for these planning obligations. The Plan should allow greater flexibility in how BTR schemes meet their affordable housing requirements, including through payments in lieu where appropriate. The specific implications for BTR viability and delivery are discussed further under HN6.

The Plan should not assume that public sector land is inherently more viable than privately owned land, as viability depends on site-specific factors. Public landowners also face differing statutory and financial obligations and cannot all prioritise wider public benefits over land receipts. RE:UK therefore asks the GLA to remove the separate public sector land requirements in Table 3.2 and apply the relevant location-based requirements, as for privately owned land.

HN5 Managing specialist accommodation

I. PBSA targets

The GLA's evidence sets out a clear need for PBSA, with only about 37 per cent of students with a housing need living in PBSA. RE:UK members Savills' submission to this consultation suggests the Plan's target may not be sufficient. It argues the evidence undercounts students at non-London-headquartered institutions, puts the student-to-bed ratio nearer 3.25:1 than 2.61:1, and shows the private rented sector, which the evidence relies on to absorb students, is contracting. The role of the Renters' Rights Act on the availability of private rented

accommodation, including buy-to-let and HMO stock, should also be considered when forecasting future demand for PBSA. The GLA should ensure that its assessment is informed by engagement with higher education providers, including their student growth projections, accommodation strategies and anticipated shortfalls.

Any concerns about the concentration of PBSA and Co-living should be supported by clear evidence and objectively defined criteria. The Plan should clarify how the concept of ‘proliferation’ is to be assessed, including the relevant geographic scale and the circumstances in which concentrations of accommodation may be considered harmful. This would support a consistent approach across boroughs and provide greater certainty for applicants and decision-makers.

The Plan should also confirm that the PBSA targets are minimums. Otherwise, boroughs may refuse further schemes because a target has been met through speculative applications that never proceed: the GLA’s evidence shows over 35,000 consented bedspaces in 2025 but only around 14,600 under construction. The GLA should clarify how existing planning permissions have been factored into the London-wide and borough-level targets, including whether schemes are realistically deliverable. Permissions that are unlikely to be implemented should not be treated as secure future supply or used to constrain further development. Savills adds that most of the secure pipeline is in Inner London, where a target read as a ceiling could truncate deliverable supply.

The GLA should revisit the methodology used to distribute the borough targets in Table 3.6, ensuring that they reflect student-specific accommodation demand, the location and growth plans of higher education institutions, and suitable development opportunities. The current approach appears to produce allocations that do not consistently reflect where students study or live, while the exclusion of the Central Activities Zone (CAZ) from the evidence base risks understating demand in central London.

The CAZ and other areas close to major higher education institutions and public transport should be recognised as priority locations for PBSA. Local authorities should also have a meaningful role in informing target numbers, drawing on their knowledge of local demand and development opportunities.

The current distribution raises questions about whether fixed borough-level allocations are the most appropriate mechanism. For example:

- The CAZ has over 223,000 students, almost half of those attending a London campus, yet Westminster has no target and Camden has a target of 725 bedspaces. Kingston upon Thames, home to Kingston University, has a target of just 300.
- Croydon, Enfield and Havering have targets of more than 1,000 bedspaces despite no identified operational PBSA need.
- Annual delivery would fall in Inner London, from around 2,175 to 1,314 bedspaces, while more than doubling in Outer London, from around 820 to 1,773. The uplift

methodology also appears to be applied inconsistently, with borough boundaries distorting the results.

RE:UK asks the GLA to publish its borough-level workings and reconsider whether fixed numerical allocations are the most appropriate approach. If targets are retained, they should be recalibrated to reflect institutional demand and suitable locations, and treated as indicative minimums rather than ceilings.

The Plan would also benefit from acknowledgement of wider benefits of PBSA, including supporting London's higher education sector, improving student choice and reducing pressure on the conventional private rented sector. These benefits should be considered alongside local impacts when determining applications.

II. Design and delivery

We welcome the greater flexibility for PBSA and co-living, including the option for payments in lieu of affordable housing contributions. We urge the GLA to ensure that payment-in-lieu calculations are transparent and proportionate, avoiding detailed viability negotiations for schemes that otherwise meet the relevant threshold route. The GLA should also ensure that the methodology for calculating affordable housing payments in lieu for PBSA reflects the sector's operating and valuation model. The Plan should provide a clear and proportionate methodology that accounts for the difference in capitalised value between market and affordable bedspaces, avoiding unnecessary complexity and uncertainty in viability assessments.

We urge the GLA to review the requirement in Part I for affordable PBSA to be secured through nomination agreements. Some higher education providers may be unwilling or unable to commit to long-term nomination arrangements, but the absence of an agreement does not necessarily indicate a lack of demand for affordable student accommodation. The policy should therefore allow objectively assessed evidence of need to inform decisions, rather than making nomination agreements a prerequisite for demonstrating demand, and should encourage coordination with higher education institutions.

HN6 Build to Rent

RE:UK welcomes recognition of BTR as a contributor to housing supply, and the Plan's encouragement of boroughs to take a supportive approach to the sector.

Whilst the Plan recognises BTR as a housing product that addresses identified need, the GLA should go further by breaking down the housing need targets into all tenures, such as identifying the need for rental homes. This would help ensure that boroughs are delivering enough BTR to meet housing need and provide investors with confidence to deliver these much-needed homes. To reinforce the need to understand these differences, the London Plan should retain explicit reference to the 'distinct economics' of BTR, which has been in place since first introduced in the 'Homes for Londoners' SPG of August 2017. We remain

open to further dialogue to enhance understanding of this topic with the GLA and boroughs as appropriate.

Additionally, the proposed affordable tenure expectations and viability assumptions need to support delivery. The GLA's viability study finds that BTR remains challenging across all tested value bands and is currently only potentially viable at low densities in high value areas. The GLA's viability study finds that BTR remains challenging across all tested value bands and is potentially viable only at lower densities in high-value areas. These challenges are compounded by the requirement to deliver affordable housing through specified rental tenures without access to grant funding. The Plan should therefore provide greater flexibility in how BTR schemes meet their affordable housing obligations, including allowing Section 106 agreements to comprise KWLR, genuinely affordable DMR or payments in lieu, where appropriate. This would help ensure that affordable housing contributions remain deliverable alongside BTR homes.

The GLA should test the policy against the funding, letting and operational model for BTR, with regard to its differences from build-for-sale housing. The policy should also be tested across different submarkets, rather than against a single assumed London-wide model, as values, rents and costs vary widely across London.

The Plan should also acknowledge that purpose-built rental buildings may require different layouts and shared facilities to operate well, as set out in our response to HN8. RE:UK seeks flexibility where standard design expectations conflict with efficient management, site optimisation or other requirements, while maintaining good outcomes for residents.

HN8 Housing design and HN9 Accessible housing

The BTR model supports high-quality housing design, but RE:UK is concerned that several requirements in the Plan are applied too rigidly, which risks creating inefficient buildings and reduces capacity at the densities the Plan seeks.

Maximising dual-aspect homes is not always feasible, particularly with the requirement for a second escape stair under the Building Safety Act, which creates inefficient buildings. The Plan should be flexible on design, particularly given the challenging viability environment, and give more weight to optimisation as opposed to rigid requirements.

The Plan should allow greater flexibility in how private amenity space is provided, particularly in high-density buildings and at upper floors, where the practical use and value of individual balconies may vary. Similarly, the cycle-storage requirement would benefit from added flexibility in provision where appropriate, supported by evidence of residents' needs and patterns of use.

RE:UK supports accessible housing and recognises that London must accommodate an ageing population. Our concern is evidence and viability. RE:UK asks the GLA to publish the evidence for the percentages and to test their viability and allow for full consultation.

It is also unclear from the current drafting of Policy HA9(A1) what is expected for the delivery of wheelchair-accessible and wheelchair-adaptable homes. Paragraph 3.7.4 of the 2021 London Plan clarifies that local wheelchair-accessible housing policies should apply only where the local authority is responsible for allocating or nominating a resident; otherwise, M4(3) homes should be wheelchair-adaptable. RE:UK asks the GLA to retain this wording, or equivalent wording, in the new Plan to provide clarity for applicants and decision-makers.

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

The Plan could make a stronger connection between employment growth, the space needed by businesses and the homes needed by their workforce. It should also be sufficiently flexible to accommodate emerging uses and changing technology over its lifetime. We welcome more explicit recognition of logistics and data centres but seek a clearer route from London-wide evidence to borough-level planning and decisions.

GLE1 Sufficient and appropriate employment space

We welcome the encouragement of flexible development and the recognition that businesses need space of different types and sizes. The policy should give clear strategic support to offices and employment growth as part of London's wider economic ambitions. It should also allow employment land and buildings to adapt as demand changes, without assuming that today's categories will describe every use that emerges over the Plan period.

Zone 1 has particular viability challenges and should be assessed in its particular market context. We welcome the approach to refurbishment and retrofit, but the restrictions on repurposing commercial buildings in the Central Activities Zone should leave sufficient flexibility for viable residential changes of use. The GLA should examine how these policies work together and whether heritage requirements enable the practical adaptation and reuse of historic buildings.

GLE2 Supply of industrial land

We view the Draft Plan's recognition of a substantial future unmet industrial and logistics requirement as a significant positive shift from previous approaches. The estimated shortfall of approximately 510–520 hectares to 2050 is sensitive to the plot-ratio and multi-storey assumptions used. The evidence uses assumptions of 55 per cent for single-storey large logistics buildings, 130 per cent for multi-storey development and 35 per cent for cross-docking, with 40 per cent of future logistics development assumed to be multi-storey. An illustrative estimate of around 820 hectares indicates how sensitive the result may be to those assumptions. We ask the GLA to test and explain the assumptions carefully, including

operational space and the effect of on-site infrastructure and biodiversity requirements. We recognise the value of the GLA quantifying a substantial requirement in the first place.

Recent delivery evidence reinforces that 520 hectares is too low. Savills reviewed nineteen industrial and logistics schemes completed in Greater London since January 2025 and found a weighted average plot ratio of approximately 0.65; only two schemes were multi-storey and none involved cross-docking. Applying a 0.65 plot ratio to Savills' market-based assessment using its Suppressed Demand model produces a land requirement of approximately 870 hectares, while a more typical 0.40 plot ratio produces approximately 1,415 hectares. Even the intensified scenario is therefore substantially above the Draft Plan figure and should be treated as a reasonable minimum benchmark, with higher-density typologies regarded as an opportunity rather than guaranteed capacity.

The Plan does not yet translate identified needs into a sufficiently clear means of securing land. Property market-area storage and distribution benchmarks would benefit from a complementary borough-level account of how capacity will be provided; the approach also needs to cover other industrial uses and last-mile logistics. The GLA should explain how boroughs will identify, allocate and protect enough land across the range of industrial and logistics activities, particularly where housing pressure is acute. We encourage the GLA to test the commercial implications of treating B8 storage and distribution as wholly separate from light industrial and manufacturing requirements within a broader market for industrial space.

The Plan should consider the consequences of releasing existing employment sites without identified replacement capacity. We seek clarity on how the draft maintains the distinctions between protections for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial land. A clearer strategic framework would help reconcile any release with the objective of expanding overall capacity. Given the scale of the requirement and the limited capacity within London, the GLA should work proactively with authorities around the M25 and beyond London to identify and plan for the proportion of need that cannot be accommodated within its boundary. This should move beyond a general commitment to cooperate and establish a quantified, corridor-based approach through Statements of Common Ground and monitoring arrangements.

We encourage the GLA to work with authorities around the M25 and beyond London to address requirements that cannot be accommodated within its boundary. Land swaps and other flexible ways of reorganising industrial land should be supported where they demonstrably maintain or improve industrial capacity. The final Plan should clarify whether any exclusions or restrictions would prevent such outcomes without a clear planning benefit.

GLE3 Data centres

We welcome a dedicated data centres policy. We ask for clearer guidance on how boroughs should plan for the scale of need and how an individual allocation would affect the

assessment of further proposals. Data centres have specific location requirements, especially access to power and fibre; clusters and network capacity do not necessarily follow borough boundaries. The Plan should set a stronger strategic framework for assessing need and suitable locations while making clear how proposals beyond identified allocations will be assessed.

The policy should be more positive and delivery-focused. Although it recognises the need for additional data-centre capacity, it does not quantify that need or establish a measurable basis for monitoring delivery. The final Plan should identify an indicative requirement expressed in megawatts of computing power, supported by clear assumptions on land, electricity capacity and phasing. This would provide decision-makers with a stronger basis for assessing proposals and weighing data-centre requirements alongside storage and distribution, manufacturing and other uses competing for industrial-type land.

Providing locally valued benefits can be difficult where the usual tests for planning obligations do not readily permit them. The GLA should consider what lawful, practical routes might help applicants and communities address local effects and benefits, without implying that a payment can replace the statutory tests. Strategic electricity investment and connection delays should be addressed alongside land-use policy.

The Plan should also explain how the identified capacity requirement will be translated into suitable locations and coordinated infrastructure investment. Where need cannot be met within London, the GLA should work with neighbouring authorities and infrastructure providers to plan provision in locations with a functional relationship to London's data-centre clusters, power networks and fibre infrastructure.

GLE7 Affordable workspace

Affordable workspace requirements would benefit from a clearer objective and evidence base, especially when applied uniformly or layered onto other obligations. Some schemes struggle to find occupiers for the space provided; service charges and business rates in new buildings can affect affordability, and space may be poorly suited to its intended users. The distinct characteristics of the commercial workspace market should be reflected in the policy.

The policy should make clear that a borough requirement must be justified by local need and viability, so that it does not inadvertently become a uniform expectation. Where provision is justified, the policy should support pooling, off-site solutions or contributions where these would create more useful space. It should avoid inflexible occupation restrictions that could delay a wider development, and allow the approach to be revisited where demand has not materialised. The GLA should also consider whether additional operational obligations are proportionate to their benefits and costs.

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

GHR1 Energy Efficiency

There is broad support from RE:UK members on using energy use intensity (EUI) and space heating demand (SHD) standards as measures of energy efficiency. These are better measures of a building's energy performance and the metrics are well understood by real estate investors and developers.

There is, however, concern about the proposed EUI targets. As the Plan notes, these go beyond the standards set in the new National Planning Policy Framework (NPPF). Feedback from RE:UK members suggests the draft targets will prove challenging, particularly for residential developments, mixed-use schemes and social and affordable housing projects. Some members have also expressed concern in relation to complex retrofit and refurbishment projects. Overly challenging targets will negatively impact development viability and housing delivery.

Some members have questioned how the proposed EUI targets will apply to development types that are not expressly listed. The Plan suggests that, in such cases, EUI and SHD data should still be collected and referenced against industry standards such as the UK Net Zero Carbon Building Standard (UKNZCBS). However, the UKNZCBS is a very ambitious standard, and one that is still very new and still evolving. We would welcome more clarity on this point.

We would also like more clarity on the requirement to monitor and report annual in-use energy demand post-construction for at least five years. Developments may meet the energy efficiency targets at the planning stage but ongoing in-use performance will depend on the occupier. Some of our members have noted a shift in some of the occupiers moving into the London market, including more life sciences, technology and AI businesses. These can be very energy-intensive occupiers. RE:UK members will always seek to cooperate and collaborate with occupiers on energy efficiency but ultimately they should not be held to account for a tenant's energy use. The GLA will need to explain how the monitoring and reporting requirements will work in practice and what the consequences will be for any perceived non-compliance.

Some members have also noted the move away from the familiar carbon-offsetting approach and have asked for clarity on how the new system will interact with existing borough policies.

GHR2 Low-cost low-carbon heat

RE:UK members welcome the approach to heating set out in the Plan. This should provide more flexibility in how low-carbon heat is delivered to developments.

We support the move away from a "heat network first" approach, as heat networks are not always the most practical or economic solution for every site.

We also welcome the increased focus on low-cost heating solutions. RE:UK members are very conscious of the need to keep heating costs as low as possible for tenants and residents, and having flexibility to establish the lowest-cost, lowest-carbon approach should help ensure that a particular low-carbon heating solution will not come at the expense of significantly higher energy costs.

We note that developers will need to comply with the Government's heat network zoning regulations. There is still significant uncertainty over the Government's heat network reforms and how heat network zoning will work in practice. If the regulations add significant cost and complexity, this will deter investors and impact viability.

GHR3 Whole life-cycle carbon

We recognise that, as operational carbon emissions fall, embodied carbon emissions account for a larger proportion of a building's carbon footprint. As such, RE:UK members support proposals to reduce the upfront and whole life carbon (WLC) emissions associated with development and construction.

However, members are concerned about the proposed baseline and aspirational embodied carbon targets, particularly for tall residential and commercial buildings. Members highlight industry evidence that increased building height carries a carbon premium, with additional requirements such as second staircases in taller residential buildings adding to the challenge. Some members consider the proposed targets unrealistic for these building types.

Members would welcome clarity on how these targets have been determined, how they account for building height and safety requirements, and how policy compliance can be demonstrated where a development cannot meet the relevant target despite measures to minimise embodied carbon. Members would also welcome clarity on how mixed-use developments and uses not expressly listed in the policy will be assessed.

Some members have noted that requiring developers to simply "minimise" and "report" WLC emissions over a building's lifespan risks weakening incentives to deliver meaningful emissions reductions across a building's lifecycle.

GHR4 Heat risk

RE:UK members agree that we need to adapt our built environment to a changing climate, and recognise that overheating is becoming a significant issue for London's buildings, particularly following recent heatwaves.

We support the focus on addressing and mitigating heat risk, including by prioritising passive cooling measures such as external shading, natural ventilation, urban greening, material selection and building layout.

Some members have noted that overheating mitigation measures can create tensions with other policy objectives, such as delivering rooftop solar PV, achieving operational energy targets and meeting density and housing targets. There should, therefore, be some flexibility in how this policy is implemented.

GHR5 Flood risk and drainage

We are supportive of measures to strengthen London's resilience to flooding, particularly the increasing risk of surface water flooding driven by climate change and urban densification. There is also support from members for greater use of sustainable drainage systems (SuDS), green infrastructure and coordinated drainage planning, which can help manage flood risk while delivering wider environmental and public realm benefits.

It will be important, however, that the policy remains practical and proportionate. For developers operating on constrained urban sites, the space needed for drainage infrastructure may compete with public realm improvements and other environmental requirements and may reduce net developable area and affect scheme viability.

Members have also noted that many flood-risk challenges are catchment-wide infrastructure issues rather than problems that can be fully solved through individual developments. They have emphasised the need for greater coordination between local authorities, water companies and infrastructure providers to ensure that developers are not left to solve wider catchment-level drainage challenges on a site-by-site basis.

GHR6–GHR8 Biodiversity, green infrastructure and accessible green space

We support measures to protect biodiversity, expand urban greening and improve access to green space, and many of our members view these outcomes as integral to high-quality placemaking. However, the sector has consistently called for flexibility in implementation, particularly on constrained urban and brownfield sites where greening, biodiversity, housing delivery, affordable housing and other policy requirements can compete for limited space and resources.

Our members are also keen to see more strategic green infrastructure and accessible green spaces planned and delivered through coordinated public-sector leadership and investment, rather than being reliant on individual development projects alone.

Chapter 6: Place visions and place-based approaches

PV1 Brownfield First Opportunity Areas

We support making effective use of brownfield land. The brownfield-first approach would benefit from a clearer delivery mechanism. The Plan should explain the infrastructure, funding, land assembly and policy flexibility needed to bring complex sites forward. A brownfield priority should be supported by contingency planning if identified capacity is delayed or cannot be delivered.

PV3 Town centres and high streets

We welcome strategic guidance that helps boroughs identify appropriate locations for intensification while retaining room for local and site-specific judgement. Redevelopment and meanwhile uses on town-centre sites often depend on tight viability. The policy should recognise that temporary occupation and flexibility over the use of existing commercial floorspace can support longer-term regeneration, subject to the circumstances of the centre and scheme.

PV5 Industrial land supporting housing growth

We seek further safeguards around the proposed route for releasing Locally Significant Industrial Sites for housing-led development through planning applications before a plan-led review. Without a clear borough-level account of replacement capacity, this route may reduce certainty about the protection of industrial land. The GLA should keep decisions on the strategic release of industrial land plan-led, supported by evidence of employment need, the effects of release and appropriate replacement provision. Where housing growth involves the release of industrial land, the Plan should show how the resulting employment requirement will be met.

PV7 Sustainable development and enhancement of the Green Belt

We would welcome a more proactive strategic approach to Green Belt locations. Given the scale of London's housing and employment needs, the Plan should be more ambitious in identifying suitable opportunities for Green Belt and grey belt release where development can be sustainably accommodated. The strategic Plan provides an important opportunity to take difficult spatial decisions that individual boroughs may be less well placed to address in isolation.

Greater strategic direction would help borough reviews contribute to the Plan's overall ambitions. The GLA should explain the strategic rationale for potential growth areas, how boroughs will be supported to take the necessary decisions, and how transport, utilities, land assembly and environmental considerations affect delivery. It would be helpful to show how the combined approach to brownfield opportunities and Green Belt release can meet housing and employment needs in practice. We encourage the GLA to consider whether its approach to Green Belt and grey belt allows sufficient scope to assess suitable locations. Identifying a limited number of growth locations should leave boroughs able to consider other suitable sites, including some golf courses. The GLA should explain how its assessment treats grey

belt and the proposed increase in Metropolitan Open Land. It should also explain the relationship with national policy and consider the cross-boundary consequences: unmet need within London can increase pressure for development immediately outside it. Transparent evidence on the deliverability of identified Green Belt locations would help support the approach.