

London Plan Team,
Greater London Authority,
City Hall,
Kamal Chunchie Way,
London,
E16 1ZE

By email only: londonplan@london.gov.uk

[X] October 2026

Dear Sir/Madam,

RE: Draft London Plan – Public Consultation – Response on behalf of the London Property Alliance

I am writing on behalf of the London Property Alliance ('the Alliance') to respond to the consultation on the draft London Plan.

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, the [City Property Association \(CPA\)](#) and the [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 strongly supports the Mayor's ambition to deliver good growth across London and to strengthen the capital's position as the UK's economic powerhouse. We particularly welcome the London Growth Plan and its ambition to raise productivity growth to an average of 2% a year over 2025 to 2035. Central London will be essential to realising that ambition. Our research, [Good Growth in Central London \(2024\)](#), shows that the CAZ+¹ occupies 2.2% of London's land area but accounts for 48% of its GVA, 41% of its jobs and 65% of its office floorspace. With a balanced approach to growth and flexible planning policy, the CAZ+ could unlock 407,000 jobs, 50,700 new homes and an additional 55.7m sq ft of commercial floorspace by 2045, boosting the UK economy by £101bn (GVA).

That potential is not guaranteed. Our latest [Global Cities Barometer \(March 2026\)](#) states that demand for high-quality office space in central London remains exceptionally strong. Our [Space for Change](#) report reveals that London's success is increasingly at risk from a critical shortage of modern workspace – a shortfall of 11 million sq ft over the next five years; a result of rising development costs and a planning system that is constraining supply. Indeed, prime vacancy across the CAZ stands at just 0.8% and Grade A at 1.7%, while office stock in the CAZ fell by 14 million sq ft between 2018 and 2023. Upgrading secondary stock to prime and Grade A quality could generate an additional £83.6bn in economic output over the next decade.

Offices are critical to London's success and they should be recognised within policy as critical economic infrastructure given their outsized role in supporting jobs and growth.

¹ The CAZ and the Northern Isle of Dogs

The new London Plan is the Mayor's most important tool for unlocking this growth. Our members share that goal, and these representations are made in a spirit of constructive partnership. We have, however, considered the draft Plan against the soundness tests in the NPPF (August 2026) and consider that a number of its policies, as drafted, are not sound. Our key points are:

1. **Planning positively for office growth.** The draft Plan should give much stronger support to economic growth, and to offices in particular, with a clear vision and overarching employment targets for the CAZ linked directly to the London Growth Plan. **Offices should be identified and supported as critical economic infrastructure.** The Plan has not objectively assessed the need for office floorspace, nor planned to meet it, and we have particular concerns that the evidence base underestimates future need in Westminster and the City of London.
2. **Recognising the role of prime offices.** Prime offices in the CAZ, particularly in the City of London and Westminster, are critical economic infrastructure. **Substantial weight should be given to the benefits of commercial office schemes,** and Local Plans should be directed to set aspirational office targets.
3. **Optimisation and tall buildings.** We support the principle of optimisation, with a focus on growth in the CAZ. Optimisation policy and design codes must encourage sustainable, innovative growth and should not needlessly constrain height and density. **Tall buildings should be able to come forward in appropriate locations in Westminster and the City of London,** to ensure that such areas maximise their delivery potential.
4. **Affordable workspace.** Affordable workspace policies **should not be applied within the CAZ** where the market already provides a wide range of lower-cost and flexible space. If policies are introduced, they must be justified by robust local evidence and tested for viability.
5. **Carbon targets.** Operational and embodied carbon policies should be evidence-led and applied in a way that does not prevent development from coming forward, consistent with the NPPF. Targets should recognise that certain building types, including tall buildings and developments on highly constrained sites, may have higher embodied carbon impacts but can deliver significant economic benefits and lower carbon outcomes on a per-worker or per-user basis.
6. **Cycle parking.** We strongly support the reduction in cycle parking standards, which reflects the evidence in the CPA's *Cycling & the City* research and its positive engagement with TfL and the City of London.

Our detailed representations are set out at Appendix 1, together with proposed modifications to address the matters of soundness we have identified.

The LPA shares the Mayor's ambition for a growing, competitive and inclusive London, and we would welcome the opportunity to discuss these representations with the GLA as the Plan progresses. We also intend to participate in the examination of the draft London Plan. Yours faithfully,

[Signature]

Charles Begley
Chief Executive, London Property Alliance

Enclosed:

Appendix 1 – London Property Alliance – Representations on the Draft London Plan

Appendix 1 – London Property Alliance – Representations on the Draft London Plan

Overarching Points

1. The London Property Alliance strongly supports the Mayor in his aspirations to set out a strategic framework to help deliver good growth across London and strengthen London's position as the UK's economic powerhouse by creating the conditions for businesses to invest, innovate and create good jobs across the capital. The London Property Alliance also welcomes the Mayor's London Growth Plan and the aspirations contained within. Optimising sustainable development within the Central Activities Zone (CAZ), particularly within the City of London and Westminster, will be essential to deliver on the Mayor's growth objectives.
2. Notwithstanding the London Property Alliance's overarching support of the draft Plan, we have considered the Plan against the soundness tests contained within the National Planning Policy Framework ('NPPF') as published in August 2026. The London Property Alliance considers there to be matters within the draft London Plan which, as drafted, are 'unsound' when set against these tests. These representations detail those matters. These representations also make comments on policy matters which do not raise soundness issues, but which we ask the Mayor to consider closely in light of their practical implications upon development.
3. We set out as follows the London Property Alliance's key points as made within these representations, namely:
 - a) **Planning positively for office growth.** The draft Plan should give much stronger support to economic growth, and to offices in particular, with a clear vision and overarching employment targets for the CAZ linked directly to the London Growth Plan. Offices should be identified and supported as economic infrastructure, critical for meeting the objectives of a modern economy and the Modern Industrial Strategy. The Plan has not objectively assessed the need for office floorspace, nor planned to meet it, and we have particular concerns that the evidence base underestimates future need in Westminster and the City of London.
 - b) **Recognising the role of prime offices.** Prime offices in the CAZ, particularly in the City of London and Westminster, are critical economic infrastructure. Substantial weight should be given to the benefits of commercial office schemes, and Local Plans should be directed to set aspirational office targets.
 - c) **Optimisation and tall buildings.** We support the principle of optimisation, with a focus on growth in the CAZ. Optimisation policy and design codes must encourage sustainable, innovative growth and should not needlessly constrain height and density. Tall buildings should be able to come forward in appropriate locations in Westminster and the City of London, to ensure that such areas maximise their delivery potential.
 - d) **Affordable workspace.** Affordable workspace policies should not be applied within the CAZ, where the market already provides a wide range of lower-cost and flexible space. If policies are introduced, they must be justified by robust local evidence and tested for viability.

- e) **Carbon targets.** Operational and embodied carbon policies should be evidence-led and applied in a way that does not prevent development from coming forward, consistent with the NPPF. Targets should recognise that certain building types, including tall buildings and developments on highly constrained sites, may have higher embodied carbon impacts but can deliver significant economic benefits and lower carbon outcomes on a per-worker or per-user basis.
 - f) **Cycle parking.** We strongly support the reduction in cycle parking standards, which reflects the evidence in the CPA's Cycling & the City research and its positive engagement with TfL and the City of London.
4. The Alliance would welcome the opportunity to discuss these representations further with the GLA. The Alliance has noted within these representations their intention to appear at the examination of the draft London Plan.

Draft London Plan Consultation – General Questions

Q1. Please tell us in what capacity you are responding?

1. Representing a stakeholder or organisation.

Q2. Please tell us what stakeholder you represent in the space below.

2. The London Property Alliance, herein referred to as “the Alliance”.
3. The Alliance 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 Zone².

Q3. Which of the following most closely describes the sector you or your organisation belongs to:

- London boroughs and local authorities
 - Development and built environment sector
 - Housing sector
 - Infrastructure, utilities and transport providers
 - Business and economy stakeholders
 - Community and resident groups
 - Equality, inclusion and representative organisations
 - Environment, climate and heritage organisations
 - Public services and institutions
 - Politicians and elected representatives
 - Other (please specify below)
4. Development and built environment sector.

² A full list of Members for the City Property Association can be found at <https://www.citypropertyassociation.com/our-members/> and Members for the Westminster Property Association can be found at <https://www.westminsterpropertyassociation.com/our-member-list/>

Q4. Do you consider that, in overall terms, the draft London Plan complies with the relevant legal and procedural requirements applicable to its preparation?

- Yes
- No

Answer Q5 only if you have chosen 'No' for Q4.

5. No. The Alliance has considered the draft London Plan against the soundness tests as set out within the NPPF (August 2026), namely Policy PM14 as well as giving consideration to the other relevant NPPF policies.

Q5. Please provide reasons for your response and identify any specific areas where you consider that the draft London Plan may not meet the legal or procedural requirements, providing evidence where appropriate?

6. The Alliance does not consider that the London Plan has been prepared in accordance with the 2026 NPPF. The reasons for this are set out in the responses to the consultation questions, but are, in summary, principally because the Plan has not sought to objectively assess the need for employment generating floorspace, particularly office floorspace, nor to provide for it. It has introduced additional quantitative standards that will have an adverse effect on deliverability and viability, contrary to Policy PM13.

Chapter 2: Making best use of land and achieving good growth

MBUL1: Spatial Strategy

Q6. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q7 only if you have chosen 'No' for Q6.

7. No.

Q7. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q8 only if you have chosen 'Don't know' for Q6.

8. **Overarching points:** NPPF Policy PM14 requires Spatial Development Strategies to set out a positive approach to delivering growth, with an appropriate strategy taking into account local growth plans (which would include the London Growth Plan). Policy MBUL1 is the London Plan's overarching spatial strategy and should clearly set out a positive, aspirational and deliverable economic objective. As drafted, the Policy does not provide this and is not positively prepared, nor consistent with national policy.

9. The importance of harnessing economic growth is emphasised both within the NPPF and the Government's Industrial Strategy (2025). The Mayor's London Growth Plan identifies that London is uniquely placed to accelerate growth and has an ambition to raise productivity growth rates to 2% average per year over 2025 to 2035. Should that ambition be realised, the London economy could be £107bn larger in 2035 and result in an extra £27.5bn in taxes to the Treasury. The Alliance's research, *Good Growth in Central London* (2024), demonstrates that a balanced approach to growth with flexible planning policy in the Central Activities Zone ('CAZ') and Northern Isle of Dogs ('NIOD') 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). Notwithstanding the importance of the CAZ and the potential it has to deliver upon the Mayor's London Growth Plan, Policy MBUL1 has no reference to the Growth Plan within policy wording and does not state that it seeks to support the Growth Plan's growth ambitions, particularly the increase in productivity growth rates.
10. In Policy MBUL1 (part (B)), housing targets are quantified whereas local plans are only directed to plan for "*proportionate space for employment*". There is no reference to commercial office floorspace, notwithstanding its economic importance. Elsewhere in the plan, storage and distribution demand benchmarks are provided. We have suggested that overarching office floorspace and jobs targets be provided within a standalone office policy, or within Policy GLE1.
11. In respect of the CAZ, it is welcome at part (B)(1) that the "full potential" of the CAZ should be realised, however as drafted the policy wording is considered not to be directive and strong enough. As identified in the Alliance's *Good Growth in Central London* report (2024), the CAZ and NIOD contributes 48% of London's GVA and 41% of the capital's jobs, despite occupying just 2.2% of its land area. However, in respect of the CAZ, Policy MBUL1 does not provide an economic vision and instead refers to "maintaining a reservoir of well-located employment land". Policy E1 in the NPPF requires development plans to set out a clear economic vision and strategy and allocate sites to implement the economic vision and strategy and meet identified needs. The London Plan as drafted does not meet these requirements and therefore is inconsistent with national policy.
12. Policy E2 in the NPPF states that "substantial weight should be given to: the economic benefits of proposals for commercial development"... "especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy". Policy MBUL1, as the overarching spatial strategy, should be clear in prioritising and supporting economic growth within the capital.
13. It is acknowledged that Policy GLE1 addresses employment space and that Policy PV2 considers growth within the CAZ. We comment on these policies separately but notwithstanding their content, it is vital that Policy MBUL1, as the guiding policy within the draft London Plan, sets out clearly London's economic vision and strategy.
14. **Modifications sought.** We summarise below the modifications suggested in order to make Policy MBUL1 'sound'. All suggested additions have been shown in **red text** and any suggested removals shown in ~~strike through red text~~:

- a) Part (A) should expressly require development to be located, phased, co-ordinated and designed to support London's economic vision and strategy. This could be:

"New housing and employment development and infrastructure investment should be located, phased, coordinated and designed to:

...

(6) enhance London's global competitiveness, including by meeting the needs of a modern economy, support the ambitions within the London Growth Plan and ensure that economic success is shared amongst all Londoners."

- b) Part (B)(1) should be amended as follows:

*"B Local plans should plan to deliver at least 558,000 additional new homes, ~~proportionate~~ space for employment and appropriate infrastructure (including health and other locally assessed social infrastructure) **to meet identified and anticipated need** in a manner consistent with Part A of this policy; policies HN1 Increasing London's housing stock, GLE1 Sufficient and appropriate employment space and the Place-vision policies. This means local plans, with reference to the key diagram and Annex C, should:*

*(1) through site allocations and review of designations, give priority to and realise the full potential of the growth corridors, the Central Activities Zone (CAZ) and the Northern Isle of Dogs (NIOD), BFOAs and other identified BLGs within the existing urban area, addressing their specific strategic opportunity where relevant, accommodating a significant proportion of required new homes ~~and~~, maintaining a reservoir of well-located employment land **and planning for economic growth aligned with the objectives within the London Growth Plan"***

Q8. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

15. No response.

MBUL2: Optimising the use of land and site capacity

Q9. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q10 only if you have chosen 'No' for Q9.

16. No.

Q10. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q11 only if you have chosen 'Don't know' for Q9.

17. **Overarching comments:** Whilst the objective of Policy MBUL2 to ensure that development makes the best use of land is supported, the Alliance is concerned that as drafted Policy MBUL2 could operate as a cap on capacity, rather than a minimum requirement. It is imperative that Policy MBUL2 be amended to ensure that it supports, rather than inhibits, the London Plan's ability to deliver commercial and residential development.
18. NPPF Policy S4 states that development within settlements (which London would be classed as) should "be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies". NPPF Policy L3 states that development proposals should make efficient use of land. The Alliance is concerned that where a scheme exceeds the density requirements of Table 2.1 or any detailed design requirements in the Small Sites Design Code/a local code, that this be treated as a failure/conflict with policy. This approach would be misaligned with the NPPF.
19. Whilst the policy does acknowledge that the standards set out within Box MBUL2 are minimum, part (C) and the policy beneath Table 2.1 have not been drafted in a positive manner which directs sites to be optimised fully. There should be much greater support for schemes which exceed the criteria set out within Policy MBUL2 and any relevant design code, where such design can be justified.
20. Policy MBUL2 applies to all development, but it is clear that it has been drafted and designed to apply to a residential context. No differentiation is provided in respect of commercial and residential development, notwithstanding the fact that these typologies are designed and occupied very differently – for example they have different floorplates and access requirements, floor-to-ceiling heights, plant and servicing needs etc. Commercial office buildings, particularly in core CAZ, often have the potential to deliver innovative designs. Given the acute shortage of high-quality commercial floorspace in central London, London Plan policy needs to be fully supportive of optimisation.
21. As drafted, there is a risk that Policy MBUL2 serves to constrain development, particularly commercial development within the CAZ, which would fail the NPPF soundness tests (Policy PM14, (a),(b) and (d)).
22. **Small Sites Design Code:** It is noted that the Small Sites Design Code or a rearticulated small sites design code prepared by plan-making authorities where applicable, will set out requirements for sites below 0.25ha. A significant number of sites, including larger scale commercial developments within the CAZ will fall under the 0.25ha threshold, and this will capture commercial as well as residential sites.
23. The Small Sites Design Code is being consulted upon separately, but it is relevant to this consultation. It does not include a typology specific to the CAZ, the nearest typology being High Streets. We will respond to the separate Small Sites consultation in due course, as required, but are concerned that the application of the High Streets typology to smaller-scale CAZ development opportunities may not support site optimisation and may constrain rather than enable development.
24. We are concerned that relatively prominent development sites, (such as 19-24 Dering Street in Westminster and 2 Moorgate, 7 Princes Street and 21 Whitefriars in the City of London)

may be below 0.25ha in size. Applying the High Street design coding to them as mandatory risks constraining, rather than enhancing, their development capacity.

25. We support the potential role of design coding, including the Small Sites Design Code, to support good growth and site optimisation in the areas of London to which the typologies included relate, but suggest an additional CAZ typology is required for the Small Sites code to be applicable in this area, if that is practical.
26. An alternative could be that Policy MBUL2 is clear that the Small Sites Design Code or any rearticulated small sites design code should not be applied to development within the CAZ, or at least commercial development within the CAZ. Instead, Policy MBUL2 could rely on the design criteria set out within the NPPF Policy DP3. Such an approach would still ensure design excellence and appropriate optimisation, but would not potentially restrict development, which is misaligned with national policy objectives and the Mayor's London Growth Plan objectives.
27. As drafted, Part (C)(2) of Policy MBUL2 is unsound as it could constrain growth within the CAZ, which does not set a positive approach to delivering growth meeting objectively assessed needs (NPPF Policy PM14(a)), nor is it an appropriate strategy to deliver on the aspirations of the Government and the Mayor via the Industrial Strategy and London Growth Plan (NPPF Policy PM14(b)). It is also not effective (Policy PM14(c)) in that it contradicts Policy MBUL1(B)(1) which states that local plans should "realise the full potential" of the CAZ.
28. **Modifications sought:** We summarise below the modifications suggested to Policy MBUL2. All suggested additions have been shown in **red text** and any suggested removals shown in **strike through red text**:
 - a) Part (A) should direct plan-making authorities to ensure that any development documents are clear that development which exceeds minimum density/height criteria will be acceptable in principle where the site is being optimised and the design is justified. These changes could be:

"Plan-making authorities should plan for growth and make the best use of land in line with Box MBUL2, taking full advantage of existing and planned levels of sustainable transport connectivity and allowing character to evolve by:

 - (1) *Developing strategies, design guides, design codes and/or masterplans that set clear expectations on scale, height, and form of development (and other parameters as relevant) for areas where a more pro-active approach is required to promote development. These should have regard to the Optimisation Framework in Table 2.1 and ensure that minimum net densities are met or exceeded. **These should make clear that development which exceeds these parameters, or any set at a local level, will be supported in principle where a design-led approach demonstrates that the proposal optimises the site, unless any adverse impacts would substantially outweigh the benefits.***
 - (2)

...

(3) *Where they consider necessary, building on the London Small Site Design Code in a local design code. In doing so this should not deviate from the overall scale and ambition set out in the London Small Site Design code or undermine development viability through additional requirements or constraints. Any local design code should make clear that development which exceeds these parameters, or any set at a local level, will be supported in principle where a design-led approach demonstrates that the proposal optimises the site, unless any adverse impacts substantially outweigh the benefits. The London Small Site Design Code or any local design code will not apply to development within the CAZ, which is expected to optimise site development to its full potential, giving due consideration to design considerations set out within the London Plan and NPPF Policy DP3.*

b) A new part should be added to Part (C), as follows:

(4) *"Schemes which optimise the use of land in accordance with this policy, including schemes which exceed the parameters of the Optimisation Framework or the London Small Sites Design Code or any applicable design strategy, design guide, design code or masterplan (where relevant), should be given very significant weight in planning decisions."*

c) The text beneath Table 2.1 should be amended to read:

~~"It may be acceptable to exceed the heights and densities expressed in the table above~~ The heights and densities expressed in the table above are a starting point for a design-led assessment of site capacity and are not a maximum. Development which exceeds them should be supported where a design-led approach demonstrates that the proposal makes optimal use of the potential of the site and is otherwise acceptable, particularly in better-connected locations. Where the height range in the Optimisation Framework exceeds 30m, applicants should follow Policy MBUL3 (Tall Buildings) to identify whether the proposed height is appropriate."

Q11. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

29. No response.

MBUL3: Tall buildings

Q12. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q13 only if you have chosen 'No' for Q12.

30. No.

Q13. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

You may want to consider the following questions as part of those reasons:

- Does the Plan identify the key needs of the area appropriately?
- **Are there additional needs that should be addressed?**
- **Is the draft policy supported by proportionate and appropriate evidence?**
- Have reasonable alternatives been considered?
- Are there alternatives you think should have been assessed?
- Can the Plan be delivered?
- What barriers may affect implementation?
- Do you consider the Plan is consistent with national policy? If not, what are the areas of inconsistency?

Answer Q14 only if you have chosen 'Don't know' for Q12.

31. **Overarching Comments:** We support the strategic ambition of Policy MBUL3, and the framework proposed for tall building development across London. The draft policy introduces a clear expectation for a plan-led approach to tall buildings, whilst retaining appropriate flexibility to permit tall buildings outside identified areas in certain circumstances.
32. **Metropolitan tall building locations:** Whilst we support the proposed requirement for local plans to incorporate the metropolitan tall building areas identified in Table 2.2, the policy should not prevent local plans from identifying additional locations for metropolitan tall buildings where this is considered appropriate, based on local evidence and assessment. We are already aware of two locations in the City of London – Broadgate/Liverpool Street and the Fleet Valley – where evidence suggests that tall building development on a metropolitan scale may be appropriate. Whilst such development could be supported under DM A(3), the London Plan should not preclude future opportunities to adopt a plan-led approach to tall building developments in these locations.
33. **Threshold of 30m:** We support the 30m threshold for use outside the CAZ. This is an appropriate approach to supporting increases in density across Greater London. We do not, however, consider the use of 30m as a default or definitive height for tall building development within the CAZ to be appropriate. The built environment across significant parts of the CAZ does not support this definition as existing prevailing building heights frequently meet or exceed this level, without being perceived as 'tall'.
34. Without amendment in respect of the CAZ, the height set in MBUL3 will be applied for plan-making and development management purposes as a fixed definition, as though the policy intention is to resist any development over 30m in height across the CAZ. We do not understand this to be the policy's intention, but it would be its effect. In this way, a proposed building of 35m in height on a major thoroughfare will be held in conflict with MBUL3, even if the proposed development is only marginally taller, or no taller at all, than neighbouring buildings in the same area. The effect would be to introduce a significant and unnecessary constraint on development across the CAZ, whereby development which is entirely

appropriate for its context is considered as a ‘tall building’ outside an identified tall building area, necessitating some form of departure from strategic policy.

35. We have included at Appendix **x** images (based upon accurate laser scanning) which were prepared by VuCity in 2019 identifying existing and approved buildings over 30m in height. Whilst this document is dated, it is apparent that much of the centre of the City of Westminster is characterised by large buildings that exceed 30m. These buildings are not tall, in the sense that they are not substantially taller than their surroundings or cause a significant change to their skyline. Without the necessary amendment, the policy would not be positively prepared nor would it be consistent with national policy. It would not be effective as it would prevent the Plan from delivering its strategic objectives.
36. **Design criteria for tall buildings:** We also have serious concerns over the proposed inclusion of a series of unduly prescriptive design criteria for tall buildings, set out at B4(i)-(xi). For example, the ‘requirement’ for a tall building to avoid any significant detrimental effect upon solar energy generation on neighbouring buildings should not be a ‘requirement’ of MBUL3. In circumstances where such an effect arises, the policy pre-empts balanced decision-making where any adverse effect might need to be balanced against the benefits of a proposed development. In a similar way, we do not see any strategic need for the London Plan to contain policies around viewing galleries and public access. In the vast majority of tall building developments this will not be a relevant consideration. Where it is relevant, typically if not exclusively in the City of London, a clear framework for consideration of this provision already exists.
37. **Modifications sought:** We summarise below the modifications suggested to Policy MBUL3. All suggested additions have been shown in **red text** and any suggested removals shown in **strike through red text**:

*“Policy aim: to set an appropriate **and positive** framework for tall building development, recognising the contribution that tall buildings make to optimising the development capacity of sites across London*

*Applies to: all local plans, and all development 30m and above in height, **or above such alternative local threshold as is identified in a local plan or indicated by the prevailing context in accordance with Part A(2) of the plan-making section***

Locations: all

Plan-making

A Plan-making authorities should:

(1) undertake an assessment and identify areas that are more or less sensitive to tall buildings.

*(2) identify the locations that may be appropriate for buildings of 30m and above in height (or at a higher threshold if locally appropriate) using the criteria in Box MBUL3 and assessment carried out as part of A(1). **Within the Central Activities Zone, outside the metropolitan tall building clusters identified in Table 2.2, a tall building is one which is significantly taller than***

the prevailing context height or which would result in a significant change to the skyline. In such areas the criteria in Part A(4) apply only to buildings meeting that definition.

(3) ~~incorporate the locations (within their areas) for direct metropolitan tall buildings to the locations (within their areas) identified in Table 2.2 and Figure 2.8 for buildings of 100m and above. Plan-making authorities may identify additional locations for metropolitan tall buildings where justified by local evidence.~~

(4) define the boundary of the locations in parts (2) and (3) and set appropriate or maximum guiding heights for these areas in local plans based on local evidence.

Development management

B Tall buildings which accord with the locational and design criteria set out below should be supported. Where a proposal does not accord with one or more of these criteria, it should be assessed against the national decision-making policies and approved unless the benefits of doing so would be substantially outweighed by any adverse effects ~~should meet the locational and design criteria set out below:~~

(1) tall buildings should be directed to the locations that the plan-making authority has identified in the local plan as appropriate in principle for buildings of this height

(2) development of 100m and above in height should be ~~limited~~ directed to the locations identified in Table 2.2, as defined by the plan-making authority in their local plan. Plan-making authorities may identify additional locations for buildings of this height where justified by local evidence.

(3) where a plan-making authority has not identified appropriate locations for tall buildings in their local plan, or if a tall building is proposed outside of a location identified in a local plan or in Table 2.2, the criteria ~~1(ii) and (iii) (and for buildings over 100m also criteria 2 (vi) and (vii))~~ in Box MBUL3 should be considered when determining if the location is acceptable in height terms. Robust justification is expected for any conflict with these criteria

(4) tall building development proposals ~~of 30m and above in height (approximately 10 storeys and above), should consider meet~~ the following ~~criteria~~ principles:

- i. Be of exemplary design and architectural quality.*
- ii. Make a positive contribution to the existing and emerging skyline where a building is prominent and not cause unacceptable harm to local or strategic views.*
- iii. Where part of a cluster, support it to be physically distinct and visually separate on the skyline from other clusters.*
- iv. Respond to the existing or emerging spatial hierarchy of the local and wider context to aid legibility and wayfinding.*
- v. ~~Address~~ Have regard to the strategic preference for building heights to be greatest towards the centre of a cluster and stepping down towards the edges and ensure appropriate transition in height (where the edges of the site are adjacent to buildings of significantly lower height).*

vi. Individually and in combination, protect and enhance the open quality (including views) of the river Thames and the riverside public realm and not contribute to the visual enclosure, canyoning or dominance of tall buildings along the river.

vii. Be designed to minimise light pollution from external lighting and avoid decorative external lighting above the base of the building unless in accordance with a LPA's lighting strategy.

viii. Not, including during their construction, interfere with aviation, navigation or telecommunication

~~ix. Avoid a significant detrimental effect on solar energy generation on adjoining buildings.~~

x. be designed for personal safety at height including suicide risk

~~xi. incorporate cultural, social or publicly accessible benefits, which may include free to enter publicly accessible areas in the most prominent tall buildings in London, where this is considered appropriate by the LPA. This area should normally be located at the top of the building to afford wider views across London.~~

C Isolated tall building ~~may be appropriate should only be considered~~ where they clearly mark a place of particular functional or spatial significance ~~or and~~ respond proportionately in height to their context or where they are replacing existing tall buildings. ~~Where an isolated tall building does not meet these criteria it should be assessed against the national decision-making policies and approved unless the benefits of doing so would be substantially outweighed by any adverse effects.~~

Box MBUL3A Tall building location criteria

Criteria for identifying tall building locations at the local plan-making stage

1. Tall buildings ~~(30m and above in height)~~ should be directed to areas ~~that meet all of which, taken as a whole, are suitable having regard to~~ the following criteria:

- i. are identified for significant growth or change in a local character study, local plan or area strategy
- ii. have very good sustainable transport connectivity (generally assumed to be SAM 4 or above)
- iii. are not unduly sensitive to the impacts of tall buildings, of the envisaged scale ~~which may give rise to adverse effects~~
- iv. have an existing or emerging townscape character that can in principle accommodate tall buildings ~~or that could accommodate a new cluster where this is supported by a local plan, framework or masterplan~~ (for example locations where there are existing tall buildings, or areas subject to comprehensive planning through a framework or masterplan).

2. Metropolitan tall buildings (100m and above in height) should be directed to the metropolitan clusters identified in Table 2.2. Outside of these identified locations, other

locations for buildings of this scale ~~should only~~ *may* be considered appropriate *having regard to where all* the following criteria ~~have been met~~:

- v. points i – iv above
- vi. it forms part of an existing or planned cluster of tall buildings designated by the LPA.
- vii. it provides a proportionate response to the height and shape of the *existing or emerging* tall building cluster.”

“2.45 This policy measures tall buildings from the ground level to the roofline of the building, ~~including but excluding~~ any rooftop equipment (see Figure 2.7). Where a proposal is submitted at the planning application stage, the height above ground level can be supplemented with heights expressed as an Above Ordnance Datum (AOD) level.

2.47 Plan-making authorities are responsible for identifying the location of *non-metropolitan* tall buildings ~~between 30 and 100 metres~~. In identifying appropriate locations, the sensitivity analysis undertaken as part of character studies helps identify where taller buildings will be more or less appropriate. Plan-making authorities can use this evidence as well as local and strategic views (see PV8 Strategic and local views) to identify where the development of ~~buildings of 30m and above in height~~ may be appropriate. ~~Where the prevailing building height is near or above 30m plan-making authorities can use a higher building height threshold to plan for.~~

Q14. If you have answered ‘Don’t know’ and want to explain why, please use the space below to do so.

38. No response.

MBUL4: Utilities capacity, connectivity, and resilience

Q15. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don’t know

Answer Q16 only if you have chosen ‘No’ for Q15.

39. **[Suggest no comment/response from LPA]**

Q16. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q17 only if you have chosen ‘Don’t know’ for Q15.

40. **[Suggest no comment/response from LPA]**

Q17. If you have answered ‘Don’t know’ and want to explain why, please use the space below to do so.

MBUL5: Sustainable Transport to enable London's Growth

Q18. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q19 only if you have chosen 'No' for Q18.

41. Don't know.

Q19. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

You may want to consider the following questions as part of those reasons:

Answer Q20 only if you have chosen 'Don't know' for Q18.

42. N/A

Q20. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

43. We have responded "don't know" to Q20 because, whilst we support the overall direction of Policy MBUL5 and do not consider that the matters raised below go to the soundness of the policy, there are a number of drafting points which we consider the GLA may wish to reflect upon in preparing the Plan for examination. We offer these constructively.
44. Part (B)(1) should make clear that any developer contributions identified at site allocation stage must be necessary and proportionate to the transport impacts of development. This would align with the statutory tests for any developer contributions required as per Regulation 122 of the Community Infrastructure Regulations 2010.
45. Part (B)(3) restricts Local Plans from setting minimum cycle parking standards lower than those in Policy GHR11. Whilst the Alliance welcomes the reduction in standards as set out within Policy GHR11, there should be flexibility for evidence-led variation, allowing local authorities to adopt lower cycle parking standards where clear and local evidence demonstrates that the GHR11 standards are not appropriate. Where higher standards are proposed, these should also be justified by an appropriate local evidence base. It could be made clear within supporting text to policy that a higher or lower local standard should be set through the local plan process only and could be acceptable where supported by current evidence on mode share, current utilisation rates, employee density, public transport accessibility, site typology, whole-life carbon and viability.
46. The City Property Association's *Cycling & the City* research found substantial under-use of existing office cycle stores and supports a lower, evidence-led standard for City offices. The Westminster Property Association has similarly supported standards that are proportionate to observed use, noting that over-provision can affect viability and add embodied carbon through unnecessary basement excavation.

47. Part (B)(4) requires local plans to identify the locations and/or circumstances in which a contribution in lieu of on-site short-stay cycle parking will be sought. Given the long plan-making processes, and the need for flexibility on a case-by-case basis, it should be made clear within supporting text that any such areas/circumstances identified in local plans will not be exhaustive. Given the increase in the use of rental e-bikes in recent years, particularly for commuting, the Alliance considers that a borough-wide strategic approach to short-stay cycle parking would be beneficial and should be joined up with the allocation of space for rental e-bike parking. This would be more effective than the current building-by-building approach to providing on-street cycle parking, whether through stands for traditional bicycles or geo-fenced spaces for rental e-bikes.
48. Part (D)(2)(i) requires that facilities for freight, deliveries and servicing allow for forward entry and exit. Whilst it is understood that this is the most preferred strategy, it must be acknowledged that on constrained sites, of which there are many in central London, forward entry and exit is not always possible due to the size, shape and orientation of sites, heritage considerations, narrow frontages, retained structures and limited back-of-house space. On-street loading facilities will be appropriate for some sites and should be permitted where they are safe and acceptable to the highway authority. Supporting policy text should also support the shared use of loading bays where appropriate. We therefore suggest that the policy be amended to reflect these possible constraints and not operate as an unintended barrier to the effective operation of constrained sites.
49. The approach set out in Part (D)(2)(ii)-(iii) is supported, subject to a balanced assessment of kerbside needs. Timed loading, shared bays and active kerbside management are often essential to the operation of retail, hospitality, offices, cultural uses and the night-time economy. The Alliance suggests that supporting policy text be added which supports the ability to use existing and new managed kerbside provision where a safety and capacity assessment demonstrates no unacceptable adverse effect. Boroughs and TfL should be directed to balance walking, cycling and bus objectives with freight, servicing, accessible set -down, taxis and the needs of existing businesses, including through time-based allocation of kerb space.
50. Part (F) refers to additional weight being given in decision making to those development proposals enabling strategic transport infrastructure requirements as referred to in Policy MBUL1 and listed in Annex D. In principle, the Alliance supports the direction of weight to be given however it is important that Table D2 in Annex D be clear that any request for funding or land is tied to an identified intervention and location, with a clear evidence base, delivery mechanism and development relationship. Contributions should be necessary, directly related to the development and fairly and reasonably related in scale and kind, with no double counting between Annex D, local plan requirements and site-specific mitigation.
51. **Modifications sought:** We summarise below the modifications suggested to draft Policy MBUL5. All suggested additions have been shown in **red text** and any suggested removals shown in ~~strike through red text~~:

“B Local plans should:

(1) identify within site allocations necessary developer contributions (both financial and physical) *in line with relevant statutory tests* to enable the transport interventions identified in Part A

(3) not include minimum cycle parking standards lower *or higher* than those in GHR11 *unless justified by suitable local evidence*, maximum car parking standards higher than those in GHR11, or any minimum car parking standards

(4) *Take a strategic approach to identifying short stay cycle parking provision across each borough, aligning with e-bike and e-scooter rental parking locations and cycle parking docking stations and identifying ~~identify~~ locations and/or circumstances in which contribution in-lieu of on-site short-stay cycle parking will be sought*

“D Facilities for freight, deliveries and servicing should be designed to:

(2) be safe, efficient and complementary to the public realm by:

*i. providing facilities off-street where appropriate given the size, shape and orientation of the site; allowing for forward entry and exit **where reasonably practicable**; not negatively impacting road safety, minimising visual impacts; and making efficient use of land”*

MBUL6: Design for a growing, changing city

Q21. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q22 only if you have chosen 'No' for Q21.

52. No (in part).

Q22. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q23 only if you have chosen 'Don't know' for Q21.

53. We responded “No, in part” to Q20 as some of the points we wish to raise relate to the tests of soundness. We have included other points for the GLA's consideration which do not necessarily engage the soundness tests but which we offer constructively for the GLA's consideration.

54. **Design, placemaking and London's world city status:** At Part (A), Policy MBUL6 states that plan-making authorities should promote “good design”, whereas the current London Plan (Policy D4) refers to “high quality design and place-making”. Arguably, this is a dilution. We note that the NPPF states at para 131 that the “*creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.*” The Alliance requests that Part (A) be amended to refer to “high

quality design and place-making”, as opposed to “good design”, which would be more closely aligned with the NPPF wording.

55. As a general point, we consider that much greater emphasis should be placed on high quality design, placemaking and the public realm, and the role that such design plays in maintaining and enhancing London’s global competitiveness. This should be reflected in the stated policy aim for MBUL6.
56. Design quality and public realm is integral to London’s status as a world city and in particular to the success of the CAZ. Creating a high quality built environment which attracts visitors, workers and investment aligns with the Mayor’s objectives in his London Growth Plan and greater emphasis should be placed on design within the draft Plan. The London Property Alliance agree with the principle of optimisation across London – but this needs to come hand in hand with a corresponding emphasis on design quality.
57. **Climate change risk modelling:** Part (A)(2) requires plan-making authorities to use “the latest climate change risk modelling” to inform site allocations, spatial policies and design specifications. The policy nor the supporting text identifies what modelling is referred to, or when/how this will be updated. Reference to the use of the “latest” modelling is not appropriate for plan-making purposes. This is therefore not an effective policy, as required by the NPPF (Policy PM14(c)). We would suggest instead that plan-making authorities are to consider the impact of climate change in developing site allocations, spatial policies and design places.
58. **Design review:** Part (D) requires all referable applications to have undergone at least one independent design review prior to submission. This is an extension of the current London Plan’s approach (Policy D4), which has not been justified. The current London Plan requires design review only for applications including over 350 residential units/ha or a tall building or where it can be demonstrated that such applications have undergone a local borough process of design scrutiny. The approach in Policy MBUL6 removes both the criteria based approach and the borough scrutiny alternative. Supporting para 2.95 states that *“Development proposals required to undergo design review as set out in Part D of this policy will form a small proportion of overall planning applications in London”*. Para 2.88 states that local authorities are *“encouraged to use design review to support the scrutiny of major applications”*.
59. The Alliance does not agree with the assertion in para 2.95 and considers that this change will result in a significant number of planning applications having to undergo design review. By way of example, under the proposed approach in MBUL6, the following applications would need to undergo design review:
 - a) Applications where there is no material change in external appearance.
 - b) Section 73 applications for schemes which have already undergone design review and been permitted.
 - c) Applications for the erection of rooftop plant, where this would fall under the referability criteria.

60. Likewise, it will not be appropriate for all major applications to undergo design review – those applications which are ‘major’ changes of use but where no or limited physical works are proposed for example.
61. Widening the scope of applications which need to undergo independent design review runs contrary to the Mayor’s and the Government’s objectives to streamline the planning process. It would also not be aligned with NPPF Policy DM1 which states that pre-application engagement should be “proportionate to the nature of the proposal and those likely to be affected by it”. It would result in unnecessary burden upon developers and local authorities and could slow down the decision-making process. The policy and supporting text should be amended accordingly.
62. **Modifications sought:** We summarise below the modifications suggested to draft Policy MBUL6 and the relevant supporting text. All suggested additions have been shown in **red text** and any suggested removals shown in ~~strike through red text~~:

*“Policy aim: to ensure that buildings and places **maintain and enhance London’s competitiveness**, quality of life and place into the future and navigate the complexities of a dense urban context through ~~good design~~ **high quality design and place-making**.”*

“A Plan-making authorities should:

- (1) promote ~~good design~~ **high quality design and place-making** that reflects growth and change needs via the use of design codes and guidance in line with Policy MBUL2*
- (2) ~~use the latest climate change risk modelling to inform~~ **consider the impact of climate change when developing** site allocations, spatial policies and design specifications in order to create resilient and adaptive places”*

*“D Development proposals that are referable to the Mayor should have undergone at least one independent design review early on in their preparation before a planning application is submitted, **or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part B if they:***

- 1) include a residential component that exceeds 350 units per hectare; or*
- 2) propose a building defined as a Metropolitan tall building; or*
- 3) Propose a building defined as a tall building (see Policy MBUL3 Tall buildings).*

The design review process should be based on the principles set out in the London Design Review Charter, taking account of parts B and C of this policy. Inclusive design review and other specialist design review and advice may be needed. Applicants should show in the design and access statement how they have considered and responded to the design review recommendations.”

*“2.88 The level of design scrutiny undertaken in a design review will be proportionate to the scale and/or impact of the proposed development. LPAs are encouraged to use design review to support the scrutiny of major development proposals **where appropriate**.”*

MBUL7: London Heritage

Q24. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q25 only if you have chosen 'No' for Q24.

63. [Suggest no comment/response from LPA]

Q25. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q26 only if you have chosen 'Don't know' for Q24.

64. [Suggest no comment/response from LPA]

Q26. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

MBUL8: Inclusive Design

Q27. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q28 only if you have chosen 'No' for Q27.

65. [Suggest no comment/response from LPA]

Q28. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q29 only if you have chosen 'Don't know' for Q27.

66. [Suggest no comment/response from LPA]

Q29. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

MBUL9: Healthy Streets and Public Realm

Q30. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q31 only if you have chosen 'No' for Q30.

67. The Alliance supports the overarching principles of Policy MBUL9, the Healthy Streets Approach and public realm improvements. Notwithstanding this, the Alliance has some comments around the policy wording in respect of its application to the CAZ.
68. Part B(1) should make clear that any off-site works or contributions sought from development are necessary to mitigate the development's material impacts or are otherwise directly related to the development. Individual schemes should not be required to remedy unrelated existing public realm deficiencies.
69. Part (B)(5) should acknowledge that within the CAZ a blanket expectation to avoid vehicle crossovers may not be realistic for many existing buildings where pedestrian and cycling improvements need to be reconciled with servicing, freight, taxis, coaches, accessible drop-off, emergency access and night-time activity.
70. As per our comments on Policy MBUL5, there should be flexibility to use existing and new managed kerbside provision where justified, as this is often essential to the operation of retail, hospitality, offices, cultural uses and the night-time economy. The supporting text for part (B)(6) should acknowledge that where a scheme materially changes kerbside or servicing arrangements, this can be justified through an appropriate kerbside/servicing assessment to allow for phased delivery where justified.
71. **Modifications sought:** We summarise below the modifications suggested to draft Policy MBUL9. All suggested additions have been shown in **red text** and any suggested removals shown in **strike through red text**:

*"B To be in line with the Healthy Streets Approach development should provide, facilitate, or contribute, **where necessary, directly linked to the development and proportionate**, towards:*

(1) high-quality walking and cycling connections including to nearby bus stops and stations, wider walking and cycling routes and other trip attractors as identified by TfL or boroughs, through transport assessments or in Annex D Table D2

...

*(5) reducing road danger and vehicle dominance created by moving and parked vehicles, **avoiding minimising** vehicle crossovers, limiting or preventing through traffic"*

Q31. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q32 only if you have chosen 'Don't know' for Q30.

72. N/A

Q32. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

MBUL10: Security and safety

Q33. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q34 only if you have chosen 'No' for Q33.

73. [Suggest no comment/response from LPA]

Q34. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q35 only if you have chosen 'Don't know' for Q33.

74. [Suggest no comment/response from LPA]

Q35. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

75. [Suggest no comment/response from LPA]

Q38. If you have any general comments about any of the chapters in this policy, please record them here. Where you have a comment about a specific policy, it would help us if you could make clear which policy your comment relates to.

76. [Suggest no comment/response from LPA]

Chapter 3: Delivering the homes and neighbourhoods (HN) Londoners need

77. We understand that LPA (Savills) is preparing a separate Member response on residential matters, which will not be covered within this response.

Chapter 4: Growing London's economy

GLE1: Sufficient and appropriate employment space

Q6. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q7 only if you have chosen 'No' for Q6.

78. No.

Q7. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q8 only if you have chosen 'Don't know' for Q6.

79. **Overarching comments:** As noted within these representations, the Alliance considers that the London Plan should include a standalone dedicated offices policy which identifies offices as economic infrastructure, critical for meeting the needs of a modern knowledge-based economy and supporting the Modern Industrial Strategy. The Plan should clearly outline and promote a positive vision for growth for commercial offices, given the importance of this sector to London. We have outlined below the key matters which any policy should address.
80. Should the GLA consider that a standalone offices policy is not required, our comments could be incorporated as amendments to Policy GLE1.
81. In order for a standalone offices policy, or Policy GLE1, to positively plan for growth and appropriately support the aspirations within the London Growth Plan and the national Industrial Strategy, as required by NPPF Policy PM14, three overarching points need to be addressed:
- a) **Overarching office targets:** The draft London Plan should provide an overarching office employment growth and floorspace demand target as per the current London Plan's approach. We have suggested that this be contained within a standalone offices policy, or Policy GLE1 (it could also be incorporated within Policy MBUL1 should the GLA be minded). We have raised significant concerns with the London Plan evidence base documents setting out employment projections, which are detailed in our note at Appendix B.
 - b) **Plan-making:** Boroughs should be directed to set aspirational targets for office employment growth and floorspace demand and ensure that any targets are not simply based on past records of delivery.
 - c) **Development management:** Decision-makers should be directed to place significant weight on the economic benefits of commercial office provision, which would be consistent with the approach in Policy E2 in the NPPF. Making this a clear priority of the Plan will also assist decision makers when assessing schemes against Policy S4 in the NPPF.
82. **Omission of an offices policy:** Policy GLE1 relates to 'employment space' but no dedicated offices policy has been provided. London Plan (2021) Policy E1 provides specific policy support for offices, including recognising and promoting the unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market and supporting text provided an overarching office jobs and floorspace demand across London. The draft London Plan does not provide any policy acknowledgement of the importance of offices.
83. This is despite the critical importance of London's office sector to the regional, national and international economy. The office market is a central driver of London's productivity, tax base and employment ecosystem. As set out in the Alliance's *Space for Change* report:

"London's office market is its engine room. The latest data indicates that office-based sectors support about 2.8m jobs across Greater London and produce almost half of the capital's

economic output – close to £290bn in GVA per annum and around £105,000 per office job. Every 100 office jobs support roughly 40 jobs in supply chains and about 18 on the high street.”

84. The CAZ plays a particularly significant role for London’s economic growth, contributing £315bn in annual GVA, with the City and Westminster comprising over £200bn of this total³. High-quality offices are where much of this economic activity happens. The latest data indicates that office-based sectors support approximately 2.8 million jobs across Greater London and produce close to £290 billion in GVA per annum⁴.

85. Notwithstanding the importance of the office market within central London, the sector is facing challenges as summarised within the Alliance’s *Space for Change: Westminster Deep Dive* report:

“However, central London’s office engine is running below capacity just when the capital needs it most. Between 2018 and 2023, the CAZ lost around 14 million sq ft, with Westminster accounting for more than 7 million sq ft of this reduction. This comes alongside a constrained development pipeline as, although Westminster remains one of the busiest planning authorities in the country, it has seen the largest relative fall in total application numbers. In particular, applications for major schemes fell around 75% between 2013-2024 and planning activity now centres on minor applications which have a limited impact on future growth perspectives.”

86. The draft Plan itself acknowledges that there is a need for office floorspace, in particular prime office floorspace. Para 4.2 states:

“The labour market projections suggest the largest growth employment sectors will continue to be in professional, scientific, technical and real estate activities and therefore London will continue to need prime office space that meets occupier demands in highly accessible locations.”

87. Financial services and professional business services – sectors which are overwhelmingly office-based – are identified as priority sectors in the Government’s Industrial Strategy. Financial, professional and business services and technology are identified as a “global city sector” within the Mayor’s London Growth Plan which is one of London’s “key strengths”. In particular London’s city centre (particularly the Square Mile, West End and Canary Wharf) is recognised as being “globally important” to this sector which the Growth Plan says “must continue to be the place where the world’s biggest and most ambitious businesses choose to locate”. Policy PM14 in the NPPF sets out that one of the soundness tests is for a spatial development strategy to set out an appropriate strategy to enable the delivery of sustainable development, taking into account the Industrial Strategy and any relevant Local Growth Plan.

88. Clearly, both the national industrial strategy and the Mayor’s industrial strategy place important emphasis on supporting and growing the financial, professional and business services, which in planning terms must be done by ensuring that such services have sufficient space of quality in which to thrive. The reference within Part A of GLE1 to plan-

³ Space for Change

⁴ Space for Change

making authorities to being “informed by the London Growth Plan” is not sufficient support for the office sector and is not a proactive approach to encouraging economic growth. The London Plan should identify and treat offices as critical economic infrastructure which is essential to meeting London’s growth aspirations.

89. The risk of not having a dedicated offices policy, or greater policy support for offices included within Policy GLE1, is that decision-makers are not directed to give the appropriate significant level of weight to applications for commercial development, particularly in central London. Providing the overarching context of the importance of the office sector in London is crucial to guide decision-makers when making balanced judgements.
90. The omission of a strategic policy on offices, or clear and specific reference to it in the overarching Policy GLE1, is inconsistent with national policy. NPPF Policy E1 requires development plans to “set out a clear economic vision and strategy, which takes a positive, proactive and realistic approach to encouraging sustainable economic growth” and which should “Allocate sites to implement the economic vision and strategy and **meet identified needs** over the plan period” (our emphasis). Neither Policy MBUL1 or Policy GLE1 provide a clear economic vision and strategy, they do not identify need, nor do they set out a proactive approach to encouraging economic growth.
91. Should the GLA consider that a standalone offices policy is not necessary, then Policy GLE1 should be amended so that specific and targeted reference and support is provided for commercial offices. The policy aim should also be amended to give greater emphasis to commercial offices. We have suggested modifications to the policy wording at the end of this question.
92. **Targets for commercial office growth:** As noted above, no office targets have been provided within the draft London Plan unlike other sectors and uses (including housing and storage and distribution). Office targets exist within the current London Plan at Table 6.1. NPPF Policy PM14 states that to be “positive”, plans should as a minimum, seek to meet an area’s objectively assessed need and set out a positive approach to delivering growth. Policy E1 in the NPPF requires development plans to set out a clear economic vision and strategy and allocate sites to implement the economic vision and strategy and meet identified needs. The London Plan as drafted does not meet these requirements and therefore is inconsistent with national policy.
93. Any such targets should be forward looking and aspirational, based on an understanding of the potential economic capacity of central London, and the priorities of the Mayor’s Growth Strategy. We suggest that the London Property Alliance’s *Good Growth in Central London* (2024) report (authored by Arup) is considered in setting those targets, noting the significant capacity identified. The report sets out three scenarios for growth within the CAZ and NIOD (together referred to in the report as ‘CAZ+’) up to 2045 – ‘balanced growth’, supported by flexible planning and growth policies, investment in local infrastructure and business support; ‘business as usual’ and ‘checks on growth’. We outline in Table 1 below the estimated office floorspace requirement for each scenario, along with jobs and the resulting impacts on GVA, homes, and borough CIL/S106 contributions and Mayoral CIL. In order to deliver a positive strategy which would support the Mayor’s London Growth Plan, the

Alliance's recommendation is that the GLA consider the projections for the 'balanced growth' scenario for offices, which has been highlighted in red:

Table 1: Balanced Growth Scenario Impacts for CAZ+ highlighting office floorspace targets

Impacts – Balanced Growth Scenario for CAZ+	2023	2045	2023-2045 change (absolute)	CAGR (Compound Annual Growth Rate)	% change over Business as Usual by 2045
Floorspace (sq ft)	314.7m	370.5m	+55.7m	+0.6%	+7.6%
Retail	30.7m	35.5m	+4.8m	+0.7%	+9.5%
Office	218.3m	259.0m	+40.7m	+0.8%	+8.1%
Hotel	41.9m	48.4m	+6.5m	+0.7%	+6.8%
F&B	11.9m	13.7m	+1.8m	+0.7%	+2.7%
Entertainment	12.0m	13.8m	+1.9m	+0.7%	+2.7%
Jobs (FTE)	2.2m	2.6m	+407,200	+0.8%	+4.0%
GVA (£m 2023)	289,600	390,900	+101,200	+1.4%	+13.1%
Homes	121,300	172,000	+50,700	+1.6%	+14.9%
Borough CIL and S106 contributions (£m, 2023 prices)	124	162	+3,125 cumulative	–	+83%

94. The Alliance raises significant concerns over the employment evidence base documents prepared to support the draft London Plan, namely the London Employment Sites Database 2024 (March 2026) ('LESD'), the London Labour Market Projections (2024-based update) (March 2026) ('LLMP') and the London Economic Uses – Supply and Demand Study (July 2026, updated September 2026). These concerns are outlined at Appendix B of these representations. In summary, the Alliance considers:

- The projections have been based on an assessment of site capacity which has itself been based on site allocations and planning permissions. This creates circularity – with low identified capacity leading to apparent limited need for future employment growth. This is particularly apparent within the City of Westminster, where the projections and growth rates seem markedly low for a central London CAZ borough which should be key to London's growth objectives.
- That the office density figures have been applied incorrectly, which has the effect of suppressing actual demand and is not reflective of occupier demand and occupation trends.

95. It is imperative that the London Plan evidence base correctly and adequately evidences and plans for future office growth within the capital. Not doing so undercuts the ability of the Mayor to meet his aspirations within the London Growth Plan and also fails the soundness tests within Policy PM14 of the NPPF.
96. In addition to an overarching target, boroughs should be directed by policy to set aspirational targets for commercial office growth, expressed both in jobs and floorspace terms. This is the approach which has been taken by the City of London within the draft City Plan 2040, where a minimum office target has been put forward, which will help guide development within the City without unduly restricting growth.
97. **Key Performance Indicator:** We note that of the proposed Key Performance Indicators ('KPIs') set out in Table A1 states that office space under construction and the remaining pipeline will be monitored with the target/expected direction of travel being that the pipeline of consented office floorspace is at least three times the average office floorspace construction over the previous three years. The Alliance supports the inclusion of this KPI, but suggest that, in order to show the need has been assessed, this should be tracked against delivery on a strategic target. We also suggest key market characteristics such of the type of space for which there is availability and demand is monitored, noting in particular the welcome support provided by Policy PV2 for prime office development with the CAZ.
98. **Economic benefits of office provision:** Policy GLE1, or a dedicated offices policy, should be clear that significant weight will be placed on the economic benefits of commercial office provision, particularly those schemes providing net prime additional office space. The inclusion of a clear economic vision and strategic office targets will assist with demonstrating weight. NPPF Policy E2 states that "substantial weight should be given to: the economic benefits of proposals for commercial development"... "especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy".
99. Financial services and professional business services – sectors which are overwhelmingly office-based – are identified as priority sectors in the Government's Industrial Strategy. In identifying financial, professional and business services and technology as a global city sector, the London Growth Plan is clear that this sector is critical to achieving the Growth Plan's first ambition to raise productivity. The absence of any direction to decision-makers on how much weight to place on the economic benefits of office provision, as the key economic infrastructure necessary to accommodate and support these sectors, is inconsistent with national policy.
100. In not providing sufficient support for office development, and by artificially constraining supply especially in the West End by underreporting the potential for additional employment, the draft Plan risks not supporting the London Growth Plan's aspiration to increase productivity growth rates. London's economic position globally is not secure. The Alliance's latest *Global Cities Barometer* (March 2026) identifies that demand for high-quality office space in central London remains exceptionally strong, but that this success is increasingly at risk, undermined by a critical shortage of modern workspace, rising development costs and a planning system that is constraining supply. The London Plan

should therefore be utilised as a tool to support the office sector, which in turn will assist with achieving the Mayor's objective to increase productivity growth rates.

101. **Quality of office provision:** The Alliance welcomes supporting para 4.13 which acknowledges that not all commercial floorspace is equivalent and that the level and quality of floorspace is an important consideration. This recognition should be carried into policy.
102. The LPA has recently published a report with Centre for London, **[insert HQ report title and date]**, which identifies that demand for headquarter-quality office space within central London remains strong, and that headquarter occupiers are more likely to be expanding rather than contracting. This reflects a shift in occupier preferences, with take up of prime office space increasing by 727% since 2020, whilst take up of Grade C space has fallen by 73%. **[Expand once we have the full report – it would be good to demonstrate the economic impact of HQ expansion over other offices/replenishment of secondary office stock]** Notwithstanding this demand and economic influence, the supply is mismatched to demand. Central London had just 1.2% vacancy in new build offices as at Q4 2025, the lowest level in five years. In several core submarkets, new-build vacancy is below 1% - this includes Mayfair (0.1%), Marylebone (0%), Fitzrovia (0.3%), Paddington (0.2%), City Core (0.1%) and City Southern (0%).
103. Prime, headquarter type accommodation is more likely to deliver planning benefits when compared to refurbishment/redevelopment of lower quality accommodation because:
 - a) The delivery of prime, headquarter accommodation is a visible signal of **investor confidence in London** as a global business location, and in the CAZ in particular.
 - b) There are £83.6bn of **productivity gains** to be unlocked by upgrading secondary office space to Prime or Grade A (as identified in the Alliance's *Space for Change* report). This directly supports the Mayor's London Growth Plan's aspirations to increase productivity.
 - c) Prime development tends to command high **environmental building performance**, achieving net zero targets and overheating resilience.
 - d) Provision of headquarter and prime accommodation generally provides greater opportunities for more comprehensive **public realm and townscape improvements**, including active ground floor frontages, publicly accessible space, improved permeability and urban greening.
 - e) Prime headquarters are frequently pre-let, giving greater **confidence in delivery** and realisation of planning benefits. As outlined in the Alliance's *Space for Change* report, 38 Berkeley Square, an 86,000 sq ft development in Mayfair was pre-let to Chanel in 2023 as its global headquarters.
104. Obviously any such benefits would need to be weighed in the balance against other planning considerations, including heritage and environmental considerations. Nonetheless, there should be a distinction made within Policy GLE1 for prime additional office space and its potential associated planning benefits. This would correlate with the acknowledgement within Policy PV2 of the role of net additional prime office space.

105. **Displacement:** The Alliance objects to part (F) of Policy GLE1. Notwithstanding that the policy has an element of flexibility in its application, no justification or evidence has been provided to establish a policy basis for the displacement of existing occupiers. No assessment has been carried out on the implications of the policy on the viability and feasibility of bringing forward commercial office development.
106. If enacted, the policy could restrict development coming forward, particularly the renewal of secondary office stock (which are more likely to house small independent occupiers).
107. The London Property Alliance's *Space for Change* report identifies that c.56% of the total office stock in the CAZ is classed as "secondary", older, second-hand assets from earlier cycles which fall below the minimum energy efficiency standards expected to apply from 2030. No consideration appears to have been given to the impact of Policy GLE1(E) on bringing forward commercial development, particularly the renewal of secondary office space. As identified in the *Space for Change* report, upgrading secondary office stock can unlock economic growth – by upgrading the quality of EPC C-G stock to Prime and Grade A quality, an additional £83.6 billion in economic output (GVA) could be generated over the next decade in today's money through productivity gains. Implementing a policy which threatens this upgrade runs contrary to the objectives of the Mayor's London Growth Plan.
108. For the reasons outlined above, Part (E) of Policy GLE1 should be deleted.
109. **Modifications sought:** As noted in our representations above, we consider that the London Plan should incorporate a standalone policy on offices.
110. Notwithstanding this position, we summarise below the modifications suggested to draft Policy GLE1 should the GLA choose not to provide a standalone policy. All suggested additions have been shown in **red text** and any suggested removals shown in **strike through red text**:

"Policy aim: to provide for the land use and floorspace needs of all sectors of the economy, including the growth, renewal and intensification of office floorspace, which is critical economic infrastructure, and support delivery of the London Growth Plan and national Industrial Strategy

Applies to: all local plans, and development that includes ~~or displaces~~ employment floorspace

Locations: all

Plan-making

A Plan-making authorities should set out policies in local plans to meet the diverse land and floorspace requirements for all economic uses by providing for a range of suitable business space of different types, sizes and price-points having regard to the needs of SMEs, larger firms and third sector organisations, ~~and informed by~~ to support the London Growth Plan and national Industrial Strategy. ~~and~~ Such requirements should be informed by London-wide and local assessments of supply and demand.

A2. Plan-making authorities should support and promote the growth, renewal and intensification of office floorspace to meet identified need. Particular support should be given to the agglomerations and clusters of world city business and specialist functions of the central London office market, including the CAZ and the Northern Isle of Dogs. Local plans should set out positively prepared policies for office growth, informed by an assessment of the quantity, quality, type and grade of office floorspace required over the plan period.

Development management

*B Developments for Class E uses should be designed flexibly, wherever possible **and appropriate** to accommodate a range of commercial, business and service uses and occupier sizes; and facilitate adaptation to future business and community needs and economic circumstances.*

C Developments for light industrial uses should be designed to meet the needs of a range of occupiers with adequate floor-to-ceiling heights and corridor widths, load-bearing floors, goods lifts and access arrangements.

D Developments for life sciences laboratory space should incorporate necessary design features and access to utilities, with particular requirements for high-capacity power, water, ventilation, load-bearing floors, higher floor-to-ceiling heights, vibration absorption and high-speed digital connectivity.

E Planning conditions restricting changes in economic or social infrastructure uses may be used in circumstances where they are justified and necessary such as:

- (1) to maintain a balance of uses appropriate to an area, or*
- (2) on sites where other uses in the same use class would not be appropriate, or*
- (3) to safeguard capacity for the intended uses such as social infrastructure, creative workspace or light industrial floorspace.*

~~*F Developments that result in the potential displacement of existing small and independent business uses should either re-provide such space in the development where feasible and appropriate in terms of its type, size and cost, including affordable workspace where this exists on-site, and/or work with the borough to ensure that appropriate relocation options are available.*~~

F Substantial weight should be given to the economic benefits of development that provides new, additional or upgraded employment floorspace, and in particular to development that provides net additional prime office floorspace, having regard to the role of the office sector as critical economic infrastructure to the aims of the London Growth Plan and national Industrial Strategy.”

Changes to Policy GLE1 should be accompanied by an updated assessment of need and growth, building upon the Alliance’s evidence base, which accurately considers the potential for additional employment and employment floorspace within the CAZ, particularly within Westminster. The borough-level projected floorspace demand at Table 7-7 of the London Economic Uses – Supply and Demand Study report (July 2026, amended September 2026)

should not be taken as an accurate objective assessment of need, because they ultimately based on previous trend delivery, not economic potential.

GLE4: Night-time economy

Q15. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q16 only if you have chosen 'No' for Q15.

111. No.

Q16. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

You may want to consider the following questions as part of those reasons:

- Does the Plan identify the key needs of the area appropriately?
- Are there additional needs that should be addressed?
- Is the draft policy supported by proportionate and appropriate evidence?
- Have reasonable alternatives been considered?
- Are there alternatives you think should have been assessed?
- Can the Plan be delivered?
- What barriers may affect implementation?
- Do you consider the Plan is consistent with national policy? If not, what are the areas of inconsistency?

112. **Overarching comments:** The Alliance supports the general intent of Policy GLE4 and the support provided to the night-time economy, which is a critical component of London's success.

113. [This matter (i.e. protection of pubs) may not be a critical issue for Members in which case we can delete this section] It appears as if Part B(5) is more onerous than existing London Plan Policy HC7 in that it could, in some instances, protect existing public house use where the existing public house does **not** have a heritage, economic, social or cultural value to local communities. NPPF Policy HC6 states that development proposals should not result in the loss of "key community facilities", such facilities being "established services that are used (or have been used) on a frequent basis in a local area". If a public house does not have any heritage, economic, social or cultural value to local communities, it is unlikely to be an "established service".

114. Other uses within redevelopments could provide placemaking, or other benefits. There should not be a de-facto restriction on the loss of public house use.

115. **Modifications sought:** We summarise below the modifications suggested to draft Policy GLE4. All suggested additions have been shown in **red text** and any suggested removals shown in ~~strike through red text~~:

“Development management

B Development proposals should:...

~~*(5) retain public house use, as part of redevelopment of the building, where this would support placemaking and the existing public house does not have a heritage, economic, social or cultural value to local communities*~~

(6) accept the loss of a public house which has a heritage, economic, social or cultural value to local communities where there is no realistic prospect of the building being used as a public house in the foreseeable future supported by compelling marketing evidence.”

GLE5: Culture and creative industries

Q18. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q19 only if you have chosen 'No' for Q18.

116. No.

Q19. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q20 only if you have chosen 'Don't know' for Q18.

117. **Protection of cultural facilities and creative industries:** NPPF Policy HC6 provides that development proposals should not result in the loss of key community facilities and public service infrastructure unless one of three conditions is satisfied. HC6(2) defines key community facilities as including "cultural venues". Cultural venues are therefore expressly the subject of a national decision-making policy which sets out both the presumption against loss and the circumstances in which loss is acceptable. Draft London Plan Policy GLE5 is inconsistent with NPPF Policy HC6 because it does not allow for any instances in which loss of a cultural facility would be acceptable. Policy GLE5 is therefore inconsistent with NPPF Policy HC6 and fails the soundness test at NPPF Policy PM14(d).

118. The London Plan 2021 (Policy HC5) requires development plans and development proposals to protect existing cultural venues, facilities and uses “where appropriate”. Any protection is to be informed by an understanding of local need. Draft Policy GLE5 simply applies a blanket restriction on loss, with no consideration of proportionality or justification.

119. NPPF Policy HC6 and London Plan (2021) Policy HC5 relate only to “cultural” facilities. Draft Policy GLE5 extends to protection of “creative industries”. The definition of culture at para

- 4.57 is wide-ranging and it is unclear which uses would be protected under Policy GLE5. Creative industries do not fall into the definition within NPPF Policy HC6; instead creative industries are only referenced within the NPPF at policies E1 and E2, both of which do not direct blanket protection of creative industries. The Mayor's London Growth Plan identifies creative industries as those linked to the exportation of film, TV, gaming, music, marketing, fashion and architecture. The Government's Creative Industries Sector Plan (linked to the UK's Modern Industrial Strategy) states that creative industries in the UK are those "which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property". The sector-plan then goes on to group these industries into nine sub-sectors: Advertising and marketing; Architecture; Crafts; Design and designer fashion; Film, TV, video, radio and photography; IT, software and computer services; Publishing; Museums, galleries and libraries; Music, performing and visual arts. This is an expansive definition. As drafted, Policy GLE5 could effectively provide protection to occupiers of all of these sectors.
120. Not only would this policy not be effective, as the drafting is unclear, it would also arguably not be positive as its rigid application could inhibit development from coming forward across London, thereby meeting London's growth needs.
 121. Policy GLE5, Part B(1) is not positive, not effective and not consistent with national policy and therefore not sound in line with NPPF Policy PM14. It should be deleted.
 122. **Duty to support new cultural facilities:** Part B(2) requires development proposals to "support the development of new cultural facilities for consumption and production uses, both standalone proposals and as part of wider development proposals". In order for the policy to be made effective, it should be made clear that this is not a blanket requirement upon all development proposals.
 123. **Re-provision of cultural facilities:** It is assumed that Part D is meant to be engaged where a development proposal results in the proposed loss of a cultural facility, but this is unclear.
 124. Part D is also inconsistent with NPPF Policy HC6 as it does not allow for other alternative routes to justify loss of a cultural facility (included at HC6(a) and (c)). In addition, part (b) of NPPF Policy HC6 refers to "equivalent **or** better provision" (our emphasis) and "comparable or improved accessibility". There is no requirement relating providing "**at least** an equivalent" (our emphasis) amount of space nor is there any requirement relating to affordability and/or affordable workspace. Policy GLE5 Part D is therefore inconsistent with NPPF Policy HC6.
 125. If retained, Part D should be clarified, or a definition introduced, so that the meaning of cultural facilities is understood and does not extend to creative industries occupying commercial Class E space.
 126. In respect of the affordability point, we note that the supporting London Plan Viability Study Phase 1 Report (July 2026) has considered the viability impact of affordable workspace upon offices and industrial uses, but not on cultural facilities. Policy GLE7 itself does not apply to cultural facilities. Affordable workspace is a contribution expected from development. NPPF Policy PM12 states that where development plans set out developer contributions, these should be set at a level that allows for the planned types of development and sites to be deliverable, and be clear. The impact of Policy GLE5 Part D has not been properly assessed

to comply with Policy PM12 and the requirements it seeks are unclear. Therefore Policy GLE5 Part D fails in two parts when considered against NPPF Policy PM12, so therefore is inconsistent. Part D should be deleted.

127. LPA's members across both Westminster and the City of London are experienced in delivering high quality, innovative cultural spaces which have contributed significantly to place-making objectives, notably the City of London's 'Destination City' programme. It should be noted that the provision of good quality, meaningful cultural space is not always necessarily linked to low affordability and values. LPA is strongly supportive of the Mayor's overarching intent to encourage and grow London's cultural architecture, but this should be through positive, flexible planning policies and led by a co-ordinated approach by the boroughs, not by restrictive policies which ultimately disincentivise good, new cultural development to come forward.
128. Moving to supporting text, para 4.55 places a strong emphasis on the existing occupier, not the planning use. NPPF Policy HC6 relates to the use only, not operators. This is not a matter for the planning system. Notwithstanding the principle, it is unclear how local authorities would secure such provisions via planning obligations which would meet the necessary tests.
129. **Meanwhile uses:** LPA strongly supports the principle of using vacant buildings and land for pop-ups or meanwhile uses for cultural and creative activities. It should be made clear that local authorities should not impose re-location or 'move on' plans for such uses which ultimately renders them permanent, and disincentivises such uses coming forward. This should be clarified either within the policy wording, or within supporting text.
130. **Modifications sought:** We summarise below the modifications suggested to draft Policy GLE5. All suggested additions have been shown in **red text** and any suggested removals shown in **strike through red text**:

"B. Development proposals should:

~~(1) protect existing cultural facilities and creative industries (consumption and production)~~

*(2) **where appropriate and feasible**, support the development of new cultural facilities for consumption and production uses, both standalone proposals and as part of wider development proposals.*

~~D. Where there are existing cultural facilities, development should provide/re-provide at least an equivalent amount of cultural space with similar affordability for end users in line with GLE7 Affordable workspace."~~

131. We suggest that supporting text clarify that re-location or 'move-on' plans should not be requested by boroughs where a temporary or meanwhile use is brought forward.

Q20. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

132. N/A

GLE6: Visitor infrastructure

Q21. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q22 only if you have chosen 'No' for Q21.

133. Yes

Q22. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q23 only if you have chosen 'Don't know' for Q21.

134. LPA supports the overarching policy aim to strengthen London's role as a world-leading visitor destination. In particular, LPA supports the widening of support for visitor accommodation when compared with Policy E10 in the London Plan (2012). It is correct that the CAZ, as the heart of the capital, be an area where the principle of visitor infrastructure is supported and encouraged.

135. The Alliance suggests that the policy and/or supporting text be amended to expressly recognise the need for appropriately located taxi/private hire and coach set down/pick-up, accessible set down and servicing. Permit shared or off-site facilities should be provided where they are safe, convenient and secured. Whilst public transport accessibility within the CAZ is high, hotels and visitor attractions still need operational vehicle arrangements. Such operational needs should not be treated as inherently contrary to car-free development.

Q23. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

136. N/A.

GLE7: Affordable workspace

Q24. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q25 only if you have chosen 'No' for Q24.

137. No.

Q25. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q26 only if you have chosen 'Don't know' for Q24.

138. **Principle of affordable workspace policies within the CAZ:** The Alliance does not consider that policy intervention in respect of affordable workspace is necessary or appropriate within core/established markets within the CAZ. The diverse nature of the CAZ's multiple, varied, office markets make a "one size fits all" policy on affordable workspace inappropriate. The Alliance's strong preference is that the policy should be revised to be clear that it is not usually applicable within the CAZ. It is considered that the approach proposed is not consistent with the clear support set out for office growth and development within Policy PV2. Its potential application to the CAZ could hinder office growth and development, particularly prime offices, which undermines the Mayor's objectives set out within the London Growth Plan, particularly the objective to raise productivity growth rates to 2% average per year over 2025 to 2035.
139. It potentially leads to the introduction of additional quantitative requirements, if affordable workspace requirements are imposed through local plan policies, that have an adverse effect on deliverability and viability, which would be contrary to Policy PM13 of the NPPF.
140. Without prejudice to this, if an enabling policy is to be retained, it should be clear that:
- a) boroughs are permitted, but not expressly directed (removal of the word "should") to consider developing local affordable workspace policies;
 - b) affordable workspace should be sought only where specifically required by local policy within an up-to-date Local Plan and not only on the basis of Policy GLE7; and
 - c) such policies should only be introduced by the Boroughs within the CAZ where there is locally specific evidence that shows a need for policy intervention in order to address evidenced market failures, with flexibility in the way in which workspace is provided. Such flexibility should include the types of uses / units that can be provided, and allow for off-site provision, and provision via a financial contribution to pooled facilities, at the choice of the developer.
141. This would ensure that such policies can only be introduced where there is a clear evidence base, tested through the Local Plan examination. Policy GLE7 should therefore be amended to specifically provide this further clarification, which should in particular provide appropriate flexibility for the CAZ area.
142. We set out, below, a detailed justification of this position.
143. **Diversity of the CAZ office market:** Within the CAZ, there is little evidence of market failure. There is a wide range of employment typologies, with an associated breadth in terms of costs and rents. Accordingly large parts of the Square Mile and CAZ provide affordable accommodation to SMEs. The City Core and other parts of the CAZ remain attractive to SME businesses, because amongst other things, the protection of heritage stock provides a constant supply of affordable workspace.
144. Further, given the nature of the space in in some CAZ submarkets, such as the West End, floorplates tend to be smaller and as a result can offer more affordable rental opportunities within these sub-markets. Evidence from our members show that leasing activity over 2021-2025 shows that 90% of take-up of units below 5,000 sq ft, both by floorspace and

transaction number, was within Grade B accommodation⁵. This demonstrates the existing market's role in accommodating smaller occupiers. Significant quantities of existing workspace are already available to occupiers across a range of locations, building types and price points.

145. One size does not fit all for SME occupiers, with some occupiers benefitting from modern fitted offices, but other occupiers may place greater emphasis on accessibility whilst other occupiers may need spaces such as studios, maker or workshop space.
146. As outlined in the Alliance's *Space for Change* report, "*central London faces a structural shortage of the workplaces and locations most in demand*", with prime vacancy across the CAZ being 0.8% and Grade A at 1.7%. Both sit well below the combined Grade B and C vacancy of 3.5%, and there is growing pressure to upgrade secondary stock to meet demand. 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.
147. **Cyclical Nature of the Office Market:** The draft policy should recognise the cyclical nature of the London office market (which is quite unlike the London housing market). The central London office sector has historically been the most cyclical in the UK, reflecting the combination of yield shift and large swings in the rental cycle. Hence the need for local flexibility, to account for variations both locally and across market cycles. Draft Policy GLE7 should ensure that any policy is viable throughout market cycles.
148. **Physical constraints:** Office buildings are often designed as a headquarters building, where one company wishes to take all or the majority of the space in the building. These developments should be encouraged within the CAZ for the benefits which they bring to London, in particular through securing London's status as a world-class city. [Insert ref to LPA HQ report] In these circumstances the provision of on-site affordable workspace would be incompatible with the special characteristics of the CAZ. Accordingly the affordable workspace policy should not be applied where evidence can be provided that on-site affordable workspace would adversely affect the ability to market the building as a headquarters (or equivalent building).
149. To maintain the special character of the CAZ, which has long included national and international headquarters of leading companies and institutions, such occupiers must be able to continue to find appropriate space. The Alliance is concerned that the inclusion of affordable workspace – as well as adding to costs – would make the CAZ's office supply less attractive to key potential investors, at a time when it is under particular pressure to remain competitive in the face of competition from other aspirant European financial centres.
150. **Evidence base:** The Alliance does not agree with the statement in para 1.43 of the London Plan Viability Study Phase 1 Report which states that "*the viability testing of office development typologies indicates that affordable workspace requirements should generally be viable in the CAZ*". The viability study has not taken proper account of the office

⁵ Table 6: Analysis of sub 5,000 sq ft take -up (2021-2025)

submarkets in the CAZ and the nuances that they generate. Even within the relatively small CAZ area, rents across the submarkets vary considerably, and therefore the provision of affordable workspace within these sub-markets can have a large impact on scheme viability.

151. Further, the viability study does not appear to take account of the cyclical nature of the office market (in addition to void and rent free periods, which are a particular feature of the commercial market). It is unclear if the viability study has undertaken appropriate sensitivity analysis, to account for likely office market cycles over the Plan period or considered the full range of potential effects of the proposed policy on development values, which will extend beyond simple reductions in headline rents but include higher build costs and higher investment yields (that is, a lower sale price) when sold.
152. Appropriate lease terms will need to be negotiated for the affordable workspace and it is therefore likely that startups and some SMEs will offer a much less secure income stream, again affecting overall development value.
153. The viability report recognises that the provision of affordable workspace will come at a cost, even if considers that this would, in most cases, not lead to development becoming unviable. The need for some form of economic subsidy, and an adverse effect on development viability, is therefore common ground. Policy PM13 of the NPPF is clear that “quantitative standards should not cover [matters other than those listed in PM13(1)] , or relate solely to the internal layout of buildings” unless “they ... will not have an adverse impact on the viability and deliverability of development.”
154. The viability report demonstrates that the introduction of the requirement will have an adverse impact on viability and deliverability, even if it considers that that impact would be limited and development would mostly remain viable. The proposal is therefore contrary to Policy PM13 and should be removed as inconsistent with national policy.
155. **Office Design:** Policy GLE1 requires developments for Class E uses (including offices) to be designed flexibly, wherever possible, to accommodate a range of uses and occupier sizes. This principle is supported and it should be acknowledged that flexible design alone can create appropriate spaces within buildings that would either be deemed to be affordable and / or provide lower cost space.
156. Rental levels can vary considerably within an office building. Rents at the lower levels of a building or space which might include poorer aspect or orientation, attract lower rents than the upper levels. The rental difference between the best quality and the more inferior space e.g. lower ground, in the same building can vary by 50%.
157. This illustrates that the market naturally provides a range of space at different price levels – even within the same building – often at a greater level of variation than that being considered within this policy without need for planning policy intervention.
158. Flexible and fitted workspace has further expanded the range of options available to SMEs, while transactions for smaller units continue to account for a significant share of leasing activity.

159. Developers, owners and their design teams, without exception in the CAZ area, specifically design commercial buildings to be flexible to ensure maximum appeal to the market. Accordingly, office buildings often have varying sized floor plates from ground to top floor (responding to the urban context), whilst floorplates are designed to enable sub-division to accommodate a range of potential occupiers, including SMEs and co-working spaces.
160. **Delivery of affordable workspace:** In the event that a policy which applies to the CAZ is retained, the Alliance would support the current approach in Policy GLE7 insofar as it would set, at a London level, the range of uses that can be delivered as affordable workspace and establish London-wide flexibility on provision of being on-site, off-site or through a payment in lieu. The acknowledgement at para 4.65 that off-site provision and payments in lieu may be particularly suitable to secure greater benefits from prime locations within the CAZ is welcome in principle (without prejudice to the Alliance's overarching objection to the principle of affordable workspace policies within the CAZ).
161. **Justification:** Changes should also be made to Part (A) of Policy GLE7 to better align with the requirements of NPPF Policy PM13. Any affordable workspace policies should include a clear and robustly costed rationale, be proportionate and should not have an adverse impact on the viability and deliverability of development. The approach taken in the current London Plan (2021, Policy E3) which specifically refers to identified evidenced shortages of lower-cost workspace or cost pressures which could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises, would be more appropriate.
162. **Existing affordable workspace:** It has been assumed that Part (E) of Policy GLE7 would apply protection to existing affordable workspace, as defined and secured through S106 legal obligations, and not simply applied to any workspace which meets the definition at paragraph 4.63 (*"workspace that is provided at rents maintained below the market rate for a specific social, cultural, or economic development purpose"*). This should be clarified and amended either through policy or in supporting text. Any re-provision requirements should be on the basis of re-providing equivalent provision.
163. **Modifications sought:** We summarise below the modifications suggested to draft Policy GLE7. All suggested additions have been shown in **red text** and any suggested removals shown in **strike-through red text**:

*"Policy aim: to provide workspace for specific social, cultural, place-making or economic development purposes that is affordable for end-users **where required**"*

Applies to: developments including offices, research and development and/or light industrial uses (Use Class E(g)), data centres and B8 storage or distribution uses

*Locations: as defined in Local Plans **(excluding the CAZ)** and existing affordable workspace [note: where this modification is not accepted, the Alliance have provided suggested modifications on a without prejudice basis]*

Plan-making

*A Plan-making authorities **may-should** include policies to support the delivery of affordable workspace, triggered by applications for new office, research and development or light*

industrial uses (Class E(g)), data centres and/or B8 storage or distribution uses where justified by strategic and local evidence of need and an assessment of viability, and where local evidence identifies shortages of lower-cost workspace, or cost pressures which could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises. Any such policy should have a clear and robustly costed rationale, be proportionate, and should not adversely affect the viability or deliverability of development, including across office market cycles.

...

Development management

D Affordable workspace should not be sought where it is demonstrated that on-site provision would prejudice the delivery of a building designed for occupation by a single organisation, or by a small number of related organisations, and where such occupation would support London's competitiveness as an international business location.

~~DE~~ Affordable workspace can be provided on-site, or in an off-site location, particularly where it is not practical or feasible to deliver on-site or economies of scale or greater levels of discount and duration of provision could be achieved through alternative means and locations. In such cases, off-site provision and/or a financial contribution to a local authority affordable workspace fund (supported by a local authority affordable workspace strategy) should be made.

*EF Where there is existing affordable workspace on-site which has been secured by planning obligation and remains extant ~~(or has been since 1 December 2017)~~, proposed development should re-provide **at least** an equivalent amount of affordable workspace (with **equivalent the same or enhanced** affordability for end-users), unless the existing affordable workspace has been provided on a temporary or meanwhile basis pending the redevelopment of the site."*

Q26. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

164.

GLE8: Access to employment and skills

Q27. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q28 only if you have chosen 'No' for Q27.

165. **[Suggest no comment/response from LPA]**

Q28. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q29 only if you have chosen 'Don't know' for Q27.

166. [Suggest no comment/response from LPA]

Q29. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

167. [Suggest no comment/response from LPA]

GLE9: Aviation

[Suggest no comment/response from LPA]

GLE10: Safeguarded wharves

[Suggest no comment/response from LPA]

GLE11: Circular economy

Q36. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q37 only if you have chosen 'No' for Q36.

168.

Q37. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q38 only if you have chosen 'Don't know' for Q36.

169.

Q38. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

170.

GLE12: Waste

Q39. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q40 only if you have chosen 'No' for Q39.

171. [Suggest no comment/response from LPA]

Q40. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q41 only if you have chosen 'Don't know' for Q39.

172. [Suggest no comment/response from LPA]

Q41. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

173. [Suggest no comment/response from LPA]

GLE13: Aggregates and mineral resources

[Suggest no comment/response from LPA]

Chapter 5: Creating a greener, resilient and healthy (GHR) city

GHR1: Energy efficiency

Q6. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q7 only if you have chosen 'No' for Q6.

174. No.

Q7. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q8 only if you have chosen 'Don't know' for Q6.

175. In the absence of national guidelines, London has led the way in decarbonising its built environment by introducing energy efficiency and whole life cycle limits to support the transition to a low carbon future. The GLA has navigated the issue of translating environmental targets around carbon into policy and this has contributed to supporting industry decarbonisation in many instances. However, this area is evolving at pace, faster than plan-making can realistically adapt. It is also becoming increasingly complex and technical whilst the level of expertise and practical understanding within individual planning authorities to set these technical limits and assess applications varies considerably.

176. The current London Plan secures energy efficiency measures through requiring a minimum 35% reduction against Part L of the Building Regulations plus a carbon offset contribution to bring the development up to a 100% reduction.

177. In response to the Government's consultation on the draft NPPF in December 2025, the Alliance agreed with the approach to Policy PM13 to support a more proportionate, streamlined and consistent approach to securing planning permission to help restore confidence and improve the overall functioning of the planning system.

178. The new NPPF published in August 2026 retains Policy S4 with its strong presumption in favour of development in settlements but includes amended wording to PM13 which requires energy efficiency for residential buildings to be calculated in accordance with Part L of the Building Regulations. A further caveat was included at PM13 (Part 2) which allows for the setting of other quantitative standards where they have a “clear and robustly costed rationale, are proportionate and will not have an adverse impact on the viability **and** deliverability of development.” (our emphasis).
179. The consultation version of the London Plan seeks to replace the adopted Part L approach with Energy Use Intensity (EUI) and Space Heating Demand (SHD) targets which would apply at a London level. The mechanism to pay a carbon offset contribution would be removed. The proposed targets are set out at Part B(1) of Policy GHR1. The GLA has acknowledged in discussions with the Alliance that further guidance is necessary to clarify the methodology and assumptions that will guide modelling to estimate EUIs for developments.
180. The Alliance recognises the tension created in the new NPPF between Policy S4 and Policy PM13, such that a clear presumption in favour of development in settlements has been established as the baseline position, with any policies seeking to apply quantitative standards over and above those explicitly identified in the NPPF required to have a clearly costed rationale, be proportionate and not have an adverse impact on the viability **and** deliverability of development.
181. In the first instance and in accordance with the updated soundness tests set out in PM14 of the NPPF, any quantitative targets should be positive, appropriate, effective and consistent with national policy. The GLA would need to demonstrate that the proposed EUI and SHD targets would not have an adverse impact on the viability and deliverability of development. Without prejudice to our comments below, the Alliance has not seen the supporting evidence to demonstrate that these targets would not have an adverse impact on viability and deliverability. Accordingly, the draft policy is in conflict with the NPPF and is, therefore, unsound.
182. Furthermore, the proposed limits reflect a relatively high level of ambition, and as a result they will not be achievable in all cases. Some of the reasons why a well-designed building may not achieve the limits include:
- The residential EUI of 40kWh/m²/yr appears very ambitious and is considered by Arup to be unrealistic for most dense urban developments. The Net Zero Standard limit for 2025 by contrast is 50kWh/m²/yr.
 - High density residential developments, particularly those in locations where the external noise environment restricts natural ventilation, will require enhanced mechanical ventilation and sometimes air-conditioning to maintain the level of internal comfort mandated in Building Regulations Part O (avoidance of overheating). This will in many cases lead to an EUI above the limit.
 - The proposed office EUI correlates approximately to a 5* NABERS rating for a notional 50 hours/week operating schedule. Office buildings in the CAZ typically operate longer hours, which will lead to a proportionally higher EUI.

- High rise buildings are inherently more energy intensive, due to lifting requirements for example. This makes the EUI limit more challenging, even without considering operating hours.
 - The targets would be typically unachievable for any development with significant retention of existing façade and/or services. The UK Net Zero Carbon Building Standard (UKNZCBS) reflects this with separate higher EUI limits for refurbishment projects.
183. Should the viability and deliverability of the proposed policy be robustly demonstrated, the Alliance requests, in the first instance, that there is a recognition in policy (as opposed to guidance) that not all developments are capable of meeting the proposed limits, and a mechanism for demonstrating best practice in those cases. Guidance should also provide a consistent methodology, including (for example) standardised assumptions on operating hours that align with the basis of the limits set.
184. The Alliance also requests that an EUI target for the retrofit of commercial buildings is included, in addition to a target for new build commercial development. This approach is consistent with the UKNZCBS which sets different targets for new build versus retrofit schemes, noting that it is more challenging for retrofit projects, by virtue of their use of existing and often inefficient building material, to meet the same EUI targets as new build development. The Alliance considers that the inclusion of one EUI target, without differentiation to the level of retention or redevelopment, is not appropriate or reflective of real-life conditions.
185. In addition, the Alliance requests that the EUI target for residential development is removed on the basis that the NPPF requires residential development to be assessed according to a separate methodology (Building Regulations). The Alliance considers that the requirement to calculate energy efficiency for residential development in accordance with Building Regulations under the NPPF and in accordance with EUI standards in the London Plan would place an onerous and unnecessary barrier to residential development in London. As such, the inclusion of EUI targets for residential development is considered neither positive nor appropriate in accordance with the soundness tests set out at PM14 of the NPPF.
186. The Alliance notes the requirement for development to monitor and report annual in-use energy demand post-construction for at least five years. The Alliance requests that the updated version of the London Plan includes an acknowledgement of the interaction between landlord and tenant usage of both commercial and residential buildings. Whilst a landlord may retrofit and redevelop a building in line with the proposed EUI targets, it is the responsibility of the tenant to operate the building in an efficient way such that the building is operated in accordance with the estimated EUI targets. It is not clear how binding obligations or conditions on a developer/landlord would be passed to a tenant and how enforceable these would be in a day to day/year to year scenario due to the lack of ability for a landlord to control day to day usage. Consequently, there should be a clear recognition that real operation may differ from early design estimate, for legitimate reasons, such as required intensity of use. The data collection regime should include collection of sufficient contextual data alongside the raw energy data to enable further understanding of this.
187. Finally, the Alliance supports the proposed removal of carbon offset contributions, as this approach has not been seen to deliver real-world outcomes since its introduction. It is

understood that over £130 million of carbon offset contributions have not been spent by London Councils.⁶

Q8. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

188. N/A

GHR2: Low-cost low-carbon heat

Q9. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
 - No
 - Don't know
- No

189. No.

Q10. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q10 only if you have chosen 'No' for Q9.

190. The adopted London Plan Policies SI2 and SI3 are reflective of the performance of the national electricity grid at the point of adoption i.e., more carbon intensive than it is currently. At the time, connecting to a centralised heat source such as a District Heat Network was the most efficient option for new development. The heating hierarchy set out in Policy SI3, therefore, prioritised centralised heat networks (DHNs) over individual electric heating systems. Since this time, however, it has become possible for on-site heating systems to be more efficient than connecting to a centralised network.

191. Policy GHR2 requires all major developments to submit a Low Carbon Heat Appraisal to establish the optimum low carbon and low cost (considering upfront, whole life and end user costs) heating solution for the site. Where relevant, it is expected that this optimum solution would comply with the government's Heat Network Zoning Regulations.

192. The Alliance recognises that the Heat Zoning Regulations came into force in January 2026 but that further regulations are forthcoming, which seek to require specified new and existing development to connect to heat networks, and where these have not yet been commissioned, to be designed for future connection.

193. In this context, the Alliance supports the requirement to submit a Low Carbon Heat Appraisal which recognises that, in some instances, that an on-site heating system can be the more efficient approach. [Arup, please confirm agreement to this approach]

⁶ [2024 Carbon Offset Monitoring Report.pdf](#)

Q11. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

194. N/A

GHR3: Whole life-cycle carbon

Q12. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q13 only if you have chosen 'No' for Q12.

195. No.

Q13. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q14 only if you have chosen 'Don't know' for Q12.

196. The Alliance is concerned that, as drafted, the targets set out within Policy GHR3 could constrain tall building development within London. This would not be a positive, nor an appropriate strategy to achieve economic growth and therefore would fail the tests of soundness within NPPF Policy PM14.
197. As set out above in respect of energy efficiency targets, LPA recognises the tension created in the new NPPF between Policy S4 and Policy PM13, such that a clear presumption in favour of developments in settlements has been established as the baseline position, with any policies seeking to apply quantitative standards over and above those explicitly identified in the NPPF required to have a clearly costed rationale, be proportionate and not have an adverse impact on the viability **and** deliverability of development.
198. The Alliance considers that the Mayor, and the examining Inspectors, should be satisfied that the inclusion of policy on this topic is consistent with national policy, and therefore sound, when considering Policy S4, PM13, and the effect of the policy on the viability and deliverability of development. Should the Mayor and the Inspectors consider it to be inconsistent, the policy in its current form should be removed.
199. The following comments are offered should the Mayor and Inspectors proceed with policy on this topic.
200. Paragraph 5.30 states that development should maximise opportunities for retaining and reusing existing structures where possible with Paragraph 5.31 clarifying that the options to retain buildings needs to be "considered in the context of ensuring that the site capacity is optimised in line with the requirements of MBUL2" and "should not be used as a means of blocking appropriate redevelopment."

The Alliance supports this clarification and agrees that the retention of buildings should be assessed in the first instance but that the spectrum of redevelopment options should be possible where it can

be demonstrated that they make the best use of land and deliver on policy requirements set out elsewhere within the Statutory Development Plan.

201. The adopted London Plan includes baseline and aspirational upfront embodied carbon and whole life carbon targets in supporting guidance.
202. The consultation version of the London Plan seeks to introduce upfront embodied carbon targets for residential development <11m, residential development >11m and Use Class E into policy. These targets are set out at Part C(1) of Policy GHR3.
203. Unlike GRH1 which specifies that the proposed energy efficiency targets function at a London-wide level, it is unclear whether Local Planning Authorities can set their own upfront embodied carbon targets. The Alliance considers that the targets should be applied across London to avoid the differentiation across localities and requests that this is clarified in the policy wording. The introduction of a standardised approach, across London, would be beneficial and welcomed.
204. Paragraph 5.35 includes a recognition of the range of uses subsumed within Use Class E and states that “the upfront embodied carbon targets are considered to be appropriate for the majority of schemes, but it is recognised that the baseline may be more challenging for some important economic uses on highly constrained sites. Applicants should demonstrate how the principles in Policy GRH3 have been applied to minimise upfront embodied carbon and set out clear justification where targets are not met.”
205. The Alliance welcomes the clarification included in Paragraph 5.35 that the targets are more achievable for some land uses than others, as this is reflective of members’ experiences operating within the tight urban grain and constraints of the built environment within the capital. This should be relocated to policy. It is important that decision makers are clear that failure to achieve any benchmarks will not in itself indicate non-compliance with Policy GHR3, as such developments will have been required to demonstrate how upfront embodied carbon has been considered and reduced where possible.

However, and as set out elsewhere in this response, the Alliance considers that similar wording should be included within the text of policy to recognise that these targets may not be achievable for certain developments such as taller buildings in addition to highly constrained sites. Building height is one of the clearest contextual factors in the embodied carbon of developments as demonstrated by Arup in the Alliance’s Embodied Carbon in Central London report.⁷ Other contextual factors include façade-to-floor ratio, extent of basements, and small buildings, which are naturally less efficient. There is also considerable variation within Class E uses themselves. Whilst office developments (Class E(g)(i)) may form the majority of the evidence base, other Class E uses, including research facilities (Class E(g)(ii)), can require significantly more intensive servicing, enhanced structural performance, and vibration mitigation measures. These requirements can materially increase embodied carbon impacts and should be explicitly recognised in the application of embodied carbon limits. Buildings with site-specific constraints, such as

⁷ [Embodied carbon in Central London - Arup](#)

those adjacent to or over transport infrastructure, will also typically have higher embodied carbon intensity resulting from non-standard structural solutions.

206. Tall building development, particularly within the City of London and Westminster, is vital to ensuring London's growth in a sustainable manner. In line with the draft Plan's overarching principles of optimisation, good growth and realising the full potential of the CAZ, it is important that Policy GHR3 does not undermine these objectives, nor the wider Government and Mayoral objectives of promoting economic growth. Given the importance of this building typology to London's economy and growth potential, it is important that the policy wording within Policy GHR3 acknowledges these instances. The Alliance therefore suggests that the policy targets apply to use classes for buildings that are not tall buildings as defined by Policy MBUL3 (also having regard to its comments on MBUL3 in relation to tall building definitions). Such buildings would still need to demonstrate that upfront embodied carbon has been considered and reduced where possible under Part (B) of the policy. **Suggested modifications:** Our modifications are subject to the Mayor and Inspectors concluding that policy in this area could be consistent with national Policy. On that basis, we summarise below the modifications suggested to Policy GHR3 (text only included below where relevant). All suggested additions have been shown in **red text** and any suggested removals shown in **strike through red text**:

"C Development should calculate and reduce upfront embodied carbon emissions.

(1) As a minimum, proposals should meet the relevant baseline targets and aim to meet the aspirational targets:

<i>Table showing baseline and aspirational upfront embodied carbon emissions targets</i>		
<i>Type</i>	<i>Baseline target</i>	<i>Aspirational target</i>
<i>Residential <11m</i>	<i>500kgCO₂e/m²</i>	<i>400kgCO₂e/m²</i>
<i>Residential ≥11m</i>	<i>700kgCO₂e/m²</i>	<i>565kgCO₂e/m²</i>
<i>Use Class E (except tall buildings)</i>	<i>700kgCO₂e/m²</i>	<i>605 kgCO₂e/m²</i>

(2) Tall buildings in Use Class E, and all development not included in the above use classes should reduce and report upfront carbon emissions, referencing relevant industry benchmarks where available."

207. The Alliance also considers that supporting paragraph 5.35 should be amended as follows:

"Class E covers a wide range of uses and differing building typologies. The upfront embodied carbon targets are considered to be appropriate for the majority of schemes, but it is recognised that the baseline may be more challenging for some important economic uses, in particular commercial office buildings in the CAZ, on highly constrained sites, including tall buildings, and over-station developments. Applicants should demonstrate how the principles in policy GHR3 have been applied to minimise upfront embodied carbon and set out clear justification where targets are not met. In such circumstances, failure to achieve the benchmark will not in itself indicate non-compliance with this policy."

208. Furthermore, the Alliance requests that guidance is clear on the version of the RICS Professional Statement which is required to be used to assess the targets. A clear definition on the reporting boundary should also be included depending on whether the assessment relates to shell only, shell and core, Cat A fit out or fully fitted developments. Without a clear definition of the reporting boundary and inclusions/exclusions, there is a risk that developments are compared on a non-equivalent basis.

Q14. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

209. N/A

GHR4: Heat risk

Q15. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q16 only if you have chosen 'No' for Q15.

210. [Suggest no comment/response from LPA]

Q16. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q17 only if you have chosen 'Don't know' for Q15.

211. [Suggest no comment/response from LPA]

Q17. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

212. [Suggest no comment/response from LPA]

GHR5: Flood risk and drainage

Q18. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q19 only if you have chosen 'No' for Q18.

213. No

Q19. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q20 only if you have chosen 'Don't know' for Q18.

214. The Alliance supports the objective of reducing London's surface-water flood risk and supports the use of sustainable drainage. Notwithstanding, the requirements imposed under draft Policy GHR5 risk unreasonably hindering development coming forward and are considered not to be consistent with national policy. We expand on these points below.
215. **Overarching requirement:** Policy GHR5 Part (B) imposes a more onerous requirement upon all development than the current Plan – with all development being directed to “not increase surface-water runoff” as opposed to current Policy SI 13 which requires development proposals to “aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.” NPPF Policy F8 states that “Development proposals which could affect drainage on or around the development site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, in ways which are proportionate to the nature and scale of the proposal.” (our emphasis).
216. Applying a blanket restriction on development to not increase surface-water runoff and targeting Qbar rates for referable applications is not achievable as in some instances within central London site circumstances and specifics may mean that surface-water runoff will be increased, or at least not achieve Qbar / 3l/ha. [Flood engineer to confirm if the 31/ha is an improvement on Qbar] Part (B)(1) states that development proposals should “incorporate at least some surface-water capture, reuse and attenuation”. On some schemes, for example, minor works to a listed building within a constrained site, there will be no opportunity to incorporate any attenuation.
217. There must be a route for development proposals to justify an alternative approach to mitigating surface-water run off where it can be demonstrated that an increase is acceptable and unavoidable. Such an approach would be aligned with the NPPF.
218. **Financial contribution:** The Alliance does not object to the principle of a financial obligation for referable applications and welcomes the flexibility which the policy framework provides in instances where provision of on-site measures are not possible. However, the rate identified in footnote 79 (£4,600/m³ or as updated by the GLA) is unjustified, inconsistent with national policy and risks further negatively affecting viability.
219. NPPF Policy PM13 restricts the ability of development plans to set quantitative standards, apart from where these “have a clear and robustly costed rationale, are proportionate and will not have an adverse impact on the viability and deliverability of development”. The financial contribution quoted in Policy GHR5 does not pass these tests. Supporting para 5.60 states that the rate has been derived from the SuDS Opportunity Mapping costings. The London Plan Viability Study Phase 1 does not test the £4,300/m³ figure and instead refers to a “very limited” sample size with £2,000 per residential unit being adopted for a single development typology. At para 1.50 the report states that the “addition of these costs is detrimental in cases where viability is already significantly constrained”. The report suggests that in these instances crediting the costs against borough CIL through a CIL in-kind

approach could be considered as an option. It does not appear that any consideration has been given to the viability impacts of the £4,300/m³ on commercial development within central London. In order for the contribution to meet the tests of NPPF Policy PM13, this should be provided. [Include example of potential £ contribution based on central London scheme (referable) shortfall]

220. Given the potential impact on deliverability and viability, the GLA should not increase the £/m³ rate without due consultation and consideration of viability and deliverability.
221. [Arup to advise if there are any significant issues with the rates set out in Part (B)(2) – these could potentially be challenged on PM13 grounds if unreasonable targets for applications within central London (note only for referable applications)]
222. **Reporting requirements:** Part (B)(4) requires applicants to ensure that suitable information is made available to update the local Flood Asset Register. Para 5.57 refers to “as built” information to be provided. Any reporting requirements should be proportionate, reasonable and clear, with a clear outline of what is to be provided, when and how this will be secured within the planning process.
223. **Suggested modifications:** We summarise below the modifications suggested to Policy GHR5 (text only included below where relevant). All suggested additions have been shown in **red text** and any suggested removals shown in **strike through red text**:

“Development management

*B. Development proposals should **minimise any increase in not increase** surface-water runoff **proportionate to the nature and scale of the proposal**; and should maximise opportunities to reduce surface-water flood risk in a manner that is consistent with an integrated water management approach. This means that they should do the following:*

*(1) Avoid increasing impermeable surfaces and incorporate at least some surface-water capture, reuse and attenuation, **where it is proportionate to the nature and scale of the proposal to do so.***

*(2) In the case of referable development, aim to achieve **on-site** greenfield run-off rates as measured in Qbar (mean average flood flow) or 3l/s/Ha (whichever is higher) **on site so far as is reasonably practicable, having regard to the site’s density, context, existing run-off rate and viability. through a combination of on-site and (contributions to) off-site sustainable drainage measures.**⁷⁸ **Where rates cannot be achieved on site, an off-site contribution towards the residual storage may be sought. In doing so:***

(i) on-site measures should be prioritised subject to the considerations in (3) below

(ii) off-site contributions should be calculated using the latest Londonwide reference rate⁷⁹ or an area-specific one where established.

78 While the National Standards for SuDs suggest a ceiling for brownfield sites, the acute surface-water flood risk issue in London means that this metric is still relevant for the purposes of quantifying appropriate off-site contributions where on site cannot be wholly achieved.

~~79 £4600/m3 or as updated by the GLA~~"

GHR6: Trees, biodiversity and geodiversity

Q21. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q22 only if you have chosen 'No' for Q21.

224. [Suggest no comment/response from LPA]

Q22. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q23 only if you have chosen 'Don't know' for Q21.

225. [Suggest no comment/response from LPA]

Q23. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

226. [Suggest no comment/response from LPA]

GHR7: Green infrastructure and Urban Greening Factor

Q24. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q25 only if you have chosen 'No' for Q24.

227. [Suggest no comment/response from LPA]

Q25. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q26 only if you have chosen 'Don't know' for Q24.

228. [Suggest no comment/response from LPA]

Q26. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

229. [Suggest no comment/response from LPA]

GHR8: Accessible green space

Q27. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q28 only if you have chosen 'No' for Q27.

230. [Suggest no comment/response from LPA]

Q28. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q29 only if you have chosen 'Don't know' for Q27.

231. [Suggest no comment/response from LPA]

Q29. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

232. [Suggest no comment/response from LPA]

GHR9: Clean and healthy waterways

Q30. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q31 only if you have chosen 'No' for Q30.

233. [Suggest no comment/response from LPA]

Q31. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q32 only if you have chosen 'Don't know' for Q30.

234. [Suggest no comment/response from LPA]

Q32. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

235. [Suggest no comment/response from LPA]

GHR10: Air quality

Q33. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q34 only if you have chosen 'No' for Q33.

236. [Suggest no comment/response from LPA]

Q34. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q35 only if you have chosen 'Don't know' for Q33.

237. [Suggest no comment/response from LPA]

Q35. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

238. [Suggest no comment/response from LPA]

GHR11: Cycle and car parking

Q36. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q37 only if you have chosen 'No' for Q36.

239. Don't know.

Q37. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q38 only if you have chosen 'Don't know' for Q36.

Q38. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

240. **Overarching comments:** The Alliance strongly supports the overarching amendments to cycle parking policy within the London Plan and the reduction of cycle parking targets. Following the publication of the City Property Association's *Cycling & the City* research, the City Property Association has engaged positively with TfL (and City of London) officers to explain the challenges around over-provision of cycle parking within development, which has resulted in significant underutilisation of cycle parking within City and Westminster office buildings. Moving towards an approach which is based more on user demand, and introduces greater flexibility around provision, is strongly welcomed by the Alliance. This ensures that buildings appropriately respond to meeting active demand, whilst not delivering unused spaces which can have viability and embodied carbon impacts.

241. The Alliance has published *The Cycle Storage Gap report* (authored by Velocity) (October 2026) which builds upon the *Cycling & the City* work and expands the evidence base across London's wider CAZ, focusing on cycle parking utilisation within modern office buildings. It underlines why, at a time when the delivery of office space in central London is constrained – undermining the UK's capacity for economic growth – and pressures on scheme viability are increasing, planning policies should ensure that cycle parking requirements reflect real demand with sensible allowances for future growth.
242. Notwithstanding this general strong support for Policy GHR11, the Alliance has some more detailed points which we flag to the GLA for consideration.
243. **Long-stay standards:** The revised method to calculating long-stay standards is a welcome improvement when compared to the current London Plan (2021). As highlighted within our response to Policy MBUL5, there should be flexibility afforded to boroughs to set lower standards, where these are robustly justified on the basis of local evidence and need.
244. Notwithstanding general support for reduction in standards, the Alliance considers that the Band 1 office standard, which would apply to Westminster, in table 5.4 may still be too high. The evidence assembled through the West End and wider CAZ surveys, as set out within the Alliance's *The Cycle Storage Gap report* shows broadly consistent private cycle mode shares of around 6–7%, materially below the 15% Band 1 assumption. The Alliance therefore suggests that the Band 1 rate for office development should be reduced to around 11%, or alternatively that the policy should make clear that a lower locally evidenced standard can be applied where supported by robust evidence on cycle mode share, employee density, utilisation and local transport conditions. The Alliance supports the Band 2 office standard.
245. Supporting paragraph 5.122 refers to reference being made to the density matrix of the Employment Density Guide or other evidence and that for offices one member of staff per 15 sqm of NIA should be assumed. The Alliance considers that flexibility should be retained where there is evidence of different likely levels of occupation. The reference within para 5.122 to the Employment Density Guide and "other evidence" should provide sufficient scope for applicants to demonstrate that an alternative assumption is appropriate.
246. **Short-stay standards:** It is noted that part (D) of Policy GLE11 provides for calculating short stay cycle parking standards where uses are not identified in Tables 5.6 and 5.7. The Alliance suggest that provision also take into account existing public provision, shared entrances and overlapping demand between uses.
247. **Alternative cycle parking and contributions:** The Alliance strongly supports the principle of flexibility of provision where on-site provision is constrained. Explicit reference should be made to the CAZ as an area where flexibility may be appropriate. The City of London and Westminster are precisely the types of dense, space constrained locations where shared, nearby or adaptive provision can produce a better outcome than individual basement storages. Heritage buildings, retrofit schemes, small footprints and complex underground conditions make this flexibility particularly important. Flexibility should be allowed in respect of provision through existing nearby stores, shared cycle hubs, public-realm provision and adaptive space, supported where appropriate by a Cycle Promotion Plan or Travel Plan, and this should be acknowledged within supporting text. Any contributions

should fund an identified, convenient, deliverable and maintained facility, with no double counting. Boroughs should also be encouraged to take a strategic approach to short-stay cycle parking, joined up with the allocation of on-street space for rental e-bike parking. It should be clarified within supporting text that existing nearby secure cycle parking/shared capacity can also form part of an alternative solution for provision.

248. At supporting paragraph 5.123, it is welcome that guidance is provided on the circumstances where flexible approaches may be taken to the delivery of minimum parking standards. Whilst this list is not drafted as exhaustive, the Alliance consider that it should be expanded to refer to situations where avoiding the need for a basement/other design requirements which materially improve viability “and whole-life carbon emissions”. This reflects the point outlined in the City Property Association’s *Cycling & the City* report which explains how the over-provision of cycling parking space can lead to producing significant associated carbon emissions.
249. **Public hire cycles and scooters:** Clarification is needed on how part(F) of Policy GHR11 relates to the minimum cycle parking standards and whether providing space for public-hire cycles or scooters can count towards other cycle parking or active travel requirements. In central London, hire bikes and scooters can support first/last-mile travel but do not generally create long-stay workplace parking demand. Part (F) should be applied where TfL or an operator identifies a network need and a long-term management plan is secured. Any requirements should be able to be reviewed if the operator or network need changes.
250. **Application of standards:** The cycle parking standards should only be applied to net additional floorspace created by development, not to existing buildings being retained and retrofitted. This will encourage the re-use of buildings but recognise the constraints of refurbishment proposals and their ability to meet standards. Where proposals will lead to an increase in cycle parking provision for existing buildings, this should be considered a planning benefit and weight given in decision making. Cycle parking standards should be applied flexibly to listed buildings, which are more limited in their ability to provide for cycle parking.
251. **Modifications sought:** We summarise below the modifications suggested to Policy GHR11 (text only included below where relevant). All suggested additions have been shown in **red text** and any suggested removals shown in **strike-through red text**:

“Development management

...

C Residential development should provide at least the number of long-stay cycle parking spaces set out in Table 5.3, or as identified in a borough’s local plan. Non-residential development should provide long-stay cycle parking spaces for at least the percentage of staff set out in Table 5.4 and the number of students or pupils in Table 5.5, or as identified in a borough’s local plan.

Application of standards: The cycle parking standards should only be applied to net additional floorspace created by development, not to existing buildings being retained and retrofitted. This will encourage the re-use of buildings but recognise the constraints of refurbishment

proposals and their ability to meet standards. Where proposals will lead to an increase in cycle parking provision for existing buildings, this should be considered a planning benefit and weight given in decision making. Cycle parking standards should be applied flexibly to listed buildings, which are more limited in their ability to provide for cycle parking.

D Development should provide at least the number of short-stay cycle parking spaces required by Tables 5.6 and 5.7, or as identified in a borough's local plan. Where uses are not listed in Tables 5.6 or 5.7, the level of provision should have regard to:

(1) borough or local cycle mode share for relevant trip purposes

(2) anticipated demand

(3) existing public provision

(4) shared entrances

(5) overlapping demand between uses

~~(6)~~ Transport for London and national guidance such as chapter 11 of Cycle Infrastructure Design.

E The cycle parking spaces required in Tables 5.3, 5.4, 5.5, 5.6 and 5.7, or any locally set standards, should be applied to net additional floorspace only, with any increased provision above standards to be given weight as a planning benefit. Standards should be applied flexibly for listed buildings with heritage constraints limiting provision.

EF If developments cannot reasonably or proportionately provide all the cycle parking required by parts C or D on site, they should provide a proportion in alternative locations, through alternative forms of provision or through contributions to this, subject to borough approval. This may be particularly appropriate in locations with high demand but limited space for cycle parking, such as the CAZ and town centres. The different types of provision should have regard to the need to encourage cycle ownership for different groups of people as well as considering the site's use and constraints. Alternative locations and provision could include:

(1) secure and enclosed, on-street (in the carriageway) parking, if the borough can identify suitable location

(2) secure cycle parking areas that serve multiple developments or a town centre

(3) space, infrastructure or both for public hire cycles, either within the curtilage of the development site or in the carriageway

(4) managed on-site shared cycles, made available in perpetuity for residents or staff.

F Development ~~should~~ can provide space, infrastructure or both for TfL's cycle-hire scheme and for other public-hire cycle and scooter schemes as part of a package to meet minimum cycle parking standards, where the development is in areas near to, or already served by, those schemes and where a network need has been identified and long-term management plan secured. The design of this space and infrastructure should be in accordance with any relevant TfL guidance."

Q41. If you have any general comments about any of the chapters in this policy, please record them here. Where you have a comment about a specific policy, it would help us if you could make clear which policy your comment relates to.

252. No comment.

Chapter 6: Place visions and place-based approaches

PV1: Brownfield first Opportunity Areas

Q6. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q7 only if you have chosen 'No' for Q6.

253. [Suggest no comment/response from LPA]

Q7. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q8 only if you have chosen 'Don't know' for Q6.

254. [Suggest no comment/response from LPA]

Q8. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

255. [Suggest no comment/response from LPA]

PV2: Central Activities Zone

Q9. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q10 only if you have chosen 'No' for Q9.

256. No.

Q10. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q11 only if you have chosen 'Don't know' for Q9.

257. **Policy aim:** The LPA strongly support the aim of Policy PV2 and part A(1) which seeks to promote and grow the CAZ. It is right that the London Plan acknowledge the crucial importance of the CAZ and its economic role within a national context. The Alliance's report,

Good Growth in Central London demonstrates that the CAZ+⁸ area occupies 2.2% of London's land area but accounts for 48% of London's GVA, 41% of its jobs and 65% of its office floorspace. The Alliance estimate that the CAZ+ contributed some £315 billion in annual GVA in 2023.

258. Notwithstanding this overarching support, we consider that Policy PV2 is unsound as it does not set out a positive approach to delivering growth, an appropriate strategy to deliver on aspirations within the national Industrial Strategy and Mayor's Growth Plan and nor is it consistent with national policy. We set out these comments below, as well as where suggested amendments to policy wording.

Offices and CAZ strategic functions – weight: The LPA strongly welcomes the specific support for the provision of “net additional prime office space” within part A(2) (as well as other commercial, business and service use floorspace). This is important, clear and directive support to the type of office accommodation that should be particularly prioritised within the CAZ. It responds to a significant structural underprovision of this type of space. As identified within the Alliance's *Space for Change* report, prime vacancy across the CAZ is 0.8% and Grade A is 1.7% and there is £83.6bn of productivity gains to be unlocked by upgrade secondary office space to prime or Grade A. The Alliance suggests that the policy be adjusted to be clear that additional prime office space can be achieved through either retrofit or redevelopment, to encourage retrofit where doing so can provide the standard of space needed, and to support redevelopment where retrofit cannot. This reflects the Alliance's *Space for Change* call for a strategic programme of renewal: retrofit where possible, new build where necessary, or a blend of the two. The policy should also refer to large, flexible floorplates, which occupiers prize and which are in acute short supply. Supporting text should note that many secondary buildings are listed or in conservation areas, and that sympathetic retrofit of these buildings to improve energy performance and specification is supported. The Alliance suggest a brief explanation of what prime office space means, within the explanatory paragraphs, would also be helpful. The *Space for Change* report defines prime spaces as “The best quality buildings in the most desirable locations, typically with an EPC rating of A or B.” This could be expanded for supporting text within the London Plan to read:

“The best quality office buildings in the most accessible and sustainable locations, typically with an EPC rating of A or B.”

259. The LPA also welcomes Part A(4) which seeks for local plans and development proposals to promote and enhance the City of London as an internationally important local for financial, professional, business and technology services and the West End as a vibrant international centre for commerce, culture and experience.
260. Notwithstanding this overarching support for the commercial sector, there is nothing in development management terms to direct decision makers to place substantial weight on the benefits of proposals for offices in the CAZ, and the other CAZ strategic functions. The LPA considers that major office schemes in city centres should be regarded as critical economic infrastructure, vital to the Government's and the Mayor's growth objectives. .

⁸ The CAZ and Northern Isle of Dogs ('NIOD') together

Space for Change recommends that such schemes be given ‘very significant weight’, on the same footing as other types of infrastructure, and that the London Plan provide a streamlined, accelerated planning route for the retrofit or redevelopment of major office schemes with large, flexible floorplates. The *Space for Change* report demonstrates that office-based sectors support approximately 2.8 million jobs across Greater London and produce close to £290 billion in GVA each year, equivalent to around £105,000 per office job, and that for every 100 office jobs a further 40 are supported through supply chains and approximately 18 through local high street activity.

261. The London Plan should be directive for decision-makers and set out clearly that substantial weight will be attached to the benefits of the CAZ strategic functions, especially prime offices. It should also recognise economic growth, employment, business opportunities and productivity as public benefits in their own right, so that they carry due weight wherever public benefits are weighed against harm, including harm to heritage assets. This would be a positive approach to plan-making, which would also be appropriate in that it would directly support the aspirations of the national Industrial Strategy and the Mayor’s Growth Plan, both of which classify the financial and professional services sector as a sector of critical importance which should be strongly supported in order to assist with productivity goals.
262. In respect of the implementation of NPPF Policy S4, such an amendment would also provide clear direction to decision-makers about the scale of benefits delivered by commercial office schemes. As drafted, Policy PV2 is silent on how the benefits of CAZ commercial function floorspace enter the planning balance tests at Policy S4. This is aligned with the direction in NPPF Policy E2 which states that substantial weight should be given to the economic benefits of proposals for commercial development.
263. **Secondary office space:** The LPA supports the acknowledgement at Policy PV2(A)(11) that there should be flexible policy around the use of obsolete secondary office space. Ensuring that such buildings and sites are optimised fully aligns with the principles set out within draft London Plan Policy MBUL2 and the NPPF. As noted within the Alliance’s *Space for Change* report, by upgrading the quality of EPC C-G stock to prime and Grade A, an additional £83.6bn in economic output (GVA) could be generated over the next decade in today’s money through productivity gains. The London Plan directly supporting the route to these gains is therefore aligned with national and Mayoral economic growth objectives.
264. The reference to the test being “viable to redevelop or refurbish as offices” should be amended to also refer to benefits delivered, not just viability. It may be marginally viable for a secondary office building to be refurbished for secondary office space, but this would not best utilise the building or the site. As demonstrated in the Alliance’s *Space for Change* report, there is a pressing need for prime office floorspace, particularly those offices accommodating headquarter operations. [add stat/ref to LPA HQ research] Such schemes are likely to deliver significant increased planning benefits above the refurbishment of secondary office space – such as increased GVA, employment, xxx. Where the benefits of redevelopment of a site for higher-specification office floorspace would be materially greater than those of refurbishment for the existing use, this should be able to be considered by the decision-maker in forming a balanced planning judgement. This approach would

better align with NPPF Policy S4, in that it would take a more positive approach to development which directly considers planning benefit versus any adverse effects.

265. **Affordable workspace:** As drafted Policy PV2(A)(12) implies a de-facto application of affordable workspace requirements on business space within the CAZ. The LPA strongly objects to the principle of affordable workspace policy within the CAZ, which are not necessary, appropriate or consistent with national policy, and has set out its response on that matter in greater detail in the response to Policy GLE7. *Space for Change* identifies viability as the single biggest barrier to upgrading secondary stock and delivering new workspace, and calls for planning obligations to be reduced and streamlined to what is genuinely essential for viable delivery. A further CAZ-wide obligation would run counter to that aim and to the delivery of the prime office floorspace sought by Part A(2).
266. Notwithstanding the LPA's comments on Policy GLE7, Policy PV2(A)(12) does not carry over any of the policy tests from GLE7 for where affordable workspace policies may apply, i.e. where these have been justified (the LPA consider such tests should go significantly further). There is no requirement for affordable workspace considerations to be applied separately within Policy PV2.
267. Policy PV2(A)(12) is not effective as it conflicts with Policy GLE7. Reference to provision of affordable workspace should be removed.
268. **Transformational gateways:** The LPA supports the recognition within Policy PV2(A)(6) of the role which the 'transformational gateways' can make to the growth of the CAZ, particularly those at Victoria and Paddington. In the London Plan (2021) these locations were identified as Opportunity Areas and provided with an identified policy framework and indicative growth targets. The specific emphasis which is being placed upon the transformational gateways, and the 'growth potential' referred to should be made clearer within policy.
269. **Loss of CAZ strategic functions:** Policy PV2(C) states that development proposals in the CAZ should not lead to a net loss of floorspace in the CAZ strategic functions, unless in identified circumstances. The draft London Plan would take a more permissive approach to loss of offices than current policy; the effect of Policy PV2 and GLE1 would be that offices would not be protected were such uses to change to another CAZ strategic function (e.g. hotel). Whilst there should be flexibility within policy for changes of use to come forward in some circumstances, e.g. where there is limited office demand, there must be some policy test for offices within the CAZ to convert to other uses. As noted in the LPA's *Space for Change* report, across the CAZ office stock fell from 213 million sq ft in 2018 to 199 million sq ft in 2023 – a loss of 14 million sq ft, with the biggest losses in Westminster and the City of London. Given the critical importance of the commercial office sector to London's and the nation's economy, it is crucial that London Plan policy seeks to protect, and grow, the overall level of office floorspace within the CAZ. This would ensure policies are positive in terms of delivering growth and appropriate in terms of delivering on the aspirations of the national Industrial Strategy and the London Growth Plan. This is consistent with Recommendation 4 of the Alliance's *Space for Change* report. **[For Member agreement – we have taken a view that there should be greater policy protection for offices. At present, the draft London Plan appears to take a more permissive approach, which could be supported. However, the Space for Change report advocated for measures to prevent the loss of office space in the**

CAZ. Our suggested amendments would still enable changes of use where these could be justified (for some secondary office space for example)]

270. The Alliance would support a targeted approach to change of use to other CAZ functions throughout the CAZ, and to residential in Mixed CAZ areas. It recommends that the London Plan require boroughs to identify broad areas or types of street where converting office space to other uses should be more readily allowed. These might be areas of limited office demand or take-up, areas with a high proportion of residential or non-commercial uses, areas isolated from transport connectivity, or concentrations of older secondary office stock.
271. Outside those areas, change of use to other CAZ uses should be allowed where there is clear evidence of sustained lack of demand and economic obsolescence, and an assessment showing that retrofit or redevelopment as an office is not viable compared with alternative uses. This gives decision-makers a clear and proportionate test, whilst protecting the office core and allowing secondary buildings in the right locations to find a productive use.
272. London Plan (2021) Policy SD(5) allowed a net loss of office floorspace to residential or mixed-use proposals where there is no reasonable and demonstrable prospect of the site being used for offices. The policy then goes on to explain that this bar could be achieved through “alternative provision of equivalent or net additional office space”. No such test remains in Policy PV12(C). This should be re-inserted, to enable the policy to be applied more flexibly and allow development to come forward in instances where land use swaps, or credits or similar approaches, could be utilised. This would be beneficial for (unallocated) mixed-use housing schemes for example, where flexibility in provision of CAZ strategic functions across the CAZ may help with delivery.
273. In the identified circumstances where a loss would be permitted, Policy PV2(C) is unclear and therefore not effective. It is unclear whether any one of the criteria can be met to justify a loss, or all need to be satisfied.
274. No definition is provided, either within policy wording or supporting text, for “reasonable prospect of continued existing use or alternative CAZ strategic function”, nor of the exercise which would need to be demonstrated by applicants to justify a loss. Whilst it is acknowledged, and supported, that residential is not the priority land use within the CAZ, there will be instances where housing-led schemes are appropriate and this principle is set out within Policy PV2. However, as drafted part (C) risks any residential proposal having to demonstrate that there is no reasonable prospect of the site being used for any of the 12 identified CAZ strategic functions. This is a high bar which most sites would not meet, and demonstrating this would be impractical. This does not give the decision-maker any opportunity to properly consider and weigh the adverse effects of a loss of CAZ strategic function versus the benefits of a use which sits outside of the CAZ strategic function. There is a tension with this approach and NPPF Policy S4 which applies a strong presumption in favour of development within settlements, particularly where for example providing residential accommodation would be a benefit which would be outweighed by the loss of an under-performing site. As drafted Policy PV2(C) is also inconsistent with NPPF Policy L3 which seeks for development proposals to make efficient use of land, and draft London Plan

Policy MBUL2 which seeks for development to optimise the use of land. Policy PV2(C) risks sites becoming stagnated and under-utilised.

275. In order for Policy PV2(C) to be effective, positive and consistent with national policy, amendments should be made which:

- a) Provide explicit protection for offices within the CAZ, unless in identified circumstances including sustained lack of demand, economic obsolescence and non-viability of office retrofit or redevelopment compared with alternative uses; and
- b) Allow the decision-maker to consider benefits and adverse effects of any proposal resulting in the loss of CAZ strategic functions.

276. **Modifications sought:** We summarise below the modifications suggested to Policy PV2 (text only included below where relevant). All suggested additions have been shown in **red text** and any suggested removals shown in **strike through red text**:

“Plan-making and development management

A Local plans, and development proposals associated with existing or proposed non-residential uses and/or new housing (as appropriate), should address and positively contribute to the realisation of the following strategic principles:

*(2) support the maintenance and growth of a diverse CAZ economic ecosystem including provision of net additional prime office **through retrofit and through redevelopment**; research and development and other commercial, business and service use floorspace, cultural and night-time economy activity, leisure, tourism and higher education uses.*

*(6) realise the **significant** growth potential of the CAZ transformational gateways associated with national rail termini (including at Euston, Liverpool Street, Paddington, Victoria and Waterloo), for development that supports CAZ strategic functions. **Local plans should identify the detailed boundaries of the transformational gateways and set out the scale of development capacity to be realised and the infrastructure required to support it.***

(9) in areas defined as ‘Core CAZ’, prioritise, sustain and enhance the agglomerations of CAZ strategic functions (defined in Box PV2), alongside housing and social infrastructure, ensuring that new residential development does not compromise the CAZ strategic functions.

(10) in areas defined as ‘Mixed CAZ’, promote, sustain and enhance the CAZ strategic functions and realise the potential for new residential development to create areas that are more mixed commercial and residential in character, complemented by social infrastructure.

*(11) support the redevelopment and refurbishment of office space to improve the quantity, quality and energy-efficiency of the stock; **having regard to the benefits which redevelopment and/or change of use would deliver relative to refurbishment for the existing use,***

*(11A) where there is clear evidence of sustained lack of office demand and economic obsolescence, and it can be demonstrated that, either, it is not viable to redevelop or refurbish as offices, **or that refurbishment or redevelopment as offices would not deliver benefits materially greater than those of the development proposed,** manage changes of use to other*

CAZ strategic function uses in line with strategic and local policies for core CAZ areas and to a mix of uses including housing in mixed CAZ areas.

(12) promote an inclusive CAZ economy and a wider cultural and innovation ecosystem, through the availability of a range of business space (including secondary space and markets) ~~and securing the delivery of (or contributions to) affordable workspace~~

Development management

C Development proposals in Core CAZ and Mixed CAZ areas should not lead to a net loss of floorspace (GIA) in CAZ strategic function uses (See Box PV2: CAZ strategic functions), **and should not lead to a net loss of office floorspace (GIA) to another CAZ strategic function use unless**

(1) there is no reasonable prospect of continued existing use or alternative CAZ strategic function use consistent with the local development plan; ~~or~~

(2) it can be demonstrated ~~in exceptional circumstances~~ that the property is obsolete and that its refurbishment or redevelopment for the existing use, or for an alternative CAZ strategic function use, is not viable or would deliver materially fewer benefits than those of the development proposed ~~is unviable to refurbish or redevelop for the existing use or for alternative CAZ strategic functions under any circumstances; or~~

(3) the site is allocated for housing or housing-led mixed-use development; ~~or~~

(4) equivalent or net additional floorspace in the relevant CAZ strategic function use is provided elsewhere within the CAZ.

D Substantial weight should be given to the economic benefits of proposals for offices and other CAZ strategic function uses, and in particular to proposals which deliver net additional prime office floorspace."

Plan-making

B Relevant plan-making authorities should:

(4) identify broad areas or types of street within the CAZ where change of use from office to other CAZ uses, including residential in Mixed CAZ areas, will be supported, having regard to the strength of office demand, letting activity, the prevailing mix of uses and concentrations of older secondary office stock.

(5) monitor total office floorspace in the CAZ through Authority Monitoring Reports, against clear indicators and triggers for review, and contribute to a single CAZ-wide record published by the Mayor.

Q11. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

PV3: Town centres and high streets

Q12. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q13 only if you have chosen 'No' for Q12.

277. [Suggest no comment/response from LPA]

Q13. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q14 only if you have chosen 'Don't know' for Q12.

278. [Suggest no comment/response from LPA]

Q14. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

279. [Suggest no comment/response from LPA]

PV4: Strategic economic clusters and corridors

Q15. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q16 only if you have chosen 'No' for Q15.

280. [Suggest no comment/response from LPA]

Q16. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q17 only if you have chosen 'Don't know' for Q15.

281. [Suggest no comment/response from LPA]

Q17. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

282. [Suggest no comment/response from LPA]

PV5: Industrial land supporting housing growth

Q18. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q19 only if you have chosen 'No' for Q18.

283. [Suggest no comment/response from LPA]

Q19. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q20 only if you have chosen 'Don't know' for Q18.

284. [Suggest no comment/response from LPA]

Q20. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

285. [Suggest no comment/response from LPA]

PV6: Metropolitan Open Land

Q21. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q22 only if you have chosen 'No' for Q21.

286. [Suggest no comment/response from LPA]

Q22. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q23 only if you have chosen 'Don't know' for Q21.

287. [Suggest no comment/response from LPA]

Q23. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

288. [Suggest no comment/response from LPA]

PV7: Sustainable development and enhancement of the Green Belt

Q24. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q25 only if you have chosen 'No' for Q24.

289. [Suggest no comment/response from LPA]

Q25. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Answer Q26 only if you have chosen 'Don't know' for Q24.

290. [Suggest no comment/response from LPA]

Q26. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

291. [Suggest no comment/response from LPA]

PV8: Strategic and local views

Q27. Do you consider that, in overall terms, the Chapter or policy identified within the draft London Plan is sound, having regard to the four tests of soundness?

- Yes
- No
- Don't know

Answer Q28 only if you have chosen 'No' for Q27.

292. **No.**

Q28. In particular, please provide reasons in the space below for your response and identify any specific areas where you consider the Plan may fail to meet any of the four tests of soundness.

Whilst we are broadly supportive of the framework proposed for the management of strategic and local views, we are concerned to ensure that there is greater clarity around the distinction between preserving and enhancing views. We also believe the status of the London View Management Framework as supplementary planning guidance should be reflected in the policy wording.

Policy Aim: As currently drafted, the Policy Aim could be interpreted as though it requires development to both preserve and enhance any given view. In our view, where development preserves the view, that should be sufficient. The current wording may support refusal of a scheme on the basis that it would not enhance a strategic or important view, having regard to the Draft LVMF 2026, the policy aim of PV8 and Part E.

London View Management Framework: As currently drafted, Plan-making Part B requires local planning authorities to "ensure that their own policies are consistent with the London View Management Framework (LVMF) which provides detailed Visual Management Guidance". This requirement implies that local plan authorities should treat the LVMF as though it were strategic policy, rather than guidance. This is misleading and should be reworded to make clear that LPAs should continue to treat the LVMF as strategic guidance.

Modifications sought: We summarise below the modifications suggested to Policy PV2 (text only included below where relevant). All suggested additions have been shown in **red text** and any suggested removals shown in ~~strike through red text~~:

Policy Aim: to support development that enables London to grow and change while preserving and, **where possible**, enhancing London's most strategic and important views that contribute to the city's identity, including supporting the Outstanding Universal Value (OUV) of London's WHS.

Plan-making Part B

B St Paul's Cathedral, the Palace of Westminster and Westminster Abbey, and the Tower of London are defined as Strategically Important Landmarks. The LVMF identifies and protects aspects of views that contribute to a viewer's ability to recognise and appreciate these landmarks and the authenticity, integrity, and attributes of Outstanding Universal Value of WHS. Where appropriate, these landmarks and WHS are subject to specific geometric constraints, called Protected Vistas and Protected Silhouettes, defined within the LVMF's Management Plans. LPAs should include all relevant LVMF Viewing Locations, Protected Vistas and Protected Silhouettes in their Local Plans and ensure that their own policies **have due regard to** ~~are consistent with~~ the London View Management Framework (LVMF) which provides detailed Visual Management Guidance.

Development Management Part E

E Development proposals should be assessed for their impact on a designated view if they are visible within the foreground, middle ground or background of a designated view. Development proposals should **seek to** make a positive contribution to the characteristics and composition of Strategic Views and their landmark elements, as set out in the LVMF. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks and WHS in these views and protect the silhouette of landmark elements as seen from designated viewing places where these have been identified in the LVMF.

Answer Q29 only if you have chosen 'Don't know' for Q27.

293.

Q29. If you have answered 'Don't know' and want to explain why, please use the space below to do so.

294.

Q32. If you have any general comments about any of the chapters in this policy, please record them here. Where you have a comment about a specific policy, it would help us if you could make clear which policy your comment relates to.

Good Growth Objectives

Q38. If you have any general comments about any of the chapters in this policy, please record them here. Where you have a comment about a specific policy, it would help us if you could make clear which policy your comment relates to.

295. The Alliance wishes to comment on the Good Growth objectives. Whilst it is acknowledged that these are not policies, they are identified as underpinning the London Plan.
296. **Growing London's economy in a way that benefits all:** In the current London Plan, GG5, one of the overarching 'Good Growth' objectives, provides a clear expression outlining that the London Plan seeks to "*conserve and enhance London's global economic competitiveness*", with parts A-H setting out aspirations to achieve that goal.
297. The economic Good Growth objective in Table 1.1 of the draft London Plan lacks aspiration. There is reference to "enabling" "economic activity to grow" and "supporting" the delivery of the London Growth Plan. This is considered too passive, which could stifle economic growth over the plan period. The London Plan should be proactive and definitive in pushing for economic growth and should continue to make a direct link between economic growth and London's global economic competitiveness.
298. **Creating a greener, resilient and healthy city:** We suggest that the Good Growth objectives, specifically objective 4 (Creating a greener, resilient and healthy city) be expanded to specifically highlight the importance of good design and placemaking to London's 'Good Growth'. The absence of design quality risks this matter being treated throughout the Plan as a secondary consideration, subordinate to the other objectives of optimisation, housing delivery, economic growth and climate and health considerations.
299. **Suggested modifications:** The Alliance suggests the below amendments to the Good Growth objectives. All suggested additions have been shown in **red text** and any suggested removals shown in **strike through red text**:

Good growth objective	Good Growth sub-objectives	Reasoned justification
Growing London's economy in a way that enhances its global competitiveness and benefits all	Secure sufficient space and infrastructure to enable encourage economic activity to grow and to enhance London's global competitiveness, including through promoting the CAZ as the powerhouse of the nation's economy. Support priority growth sectors and businesses to improve their productivity and to thrive. Support economic clusters to evolve, to better meet the diverse and changing needs of people and businesses; and to	Planning has a vital role to play in supporting the delivery of the London Growth Plan, including the first ambition to raise productivity. As well as tackling the lack of affordable housing, planning also needs to help deliver commercial floorspace, including offices, in order to deliver on London's economic growth aspirations and unlock a range of premises for offices, lab space, industrial and creative workspace, experience, leisure and retail – as well as the growing

	improve their resilience to economic and social change. Improve access to jobs, skills and opportunities for all by ensuring office floorspace is prioritised in the CAZ . Contribute to an accelerated shift to a more sustainable economy, reducing local and global environmental harm.	demand for data centres. It also needs to ensure that land is available for critical infrastructure (such as transport and energy) and other needs. This needs to be done in a way that secures the benefits while minimising environmental and other impacts. Supporting growth within the CAZ will be key to achieving this objective.
Creating a well-designed, greener, resilient and healthy city	Contribute to creating well-designed, high quality places and spaces which seek to conserve and enhance London's global competitiveness. Contribute to realising London's net zero- carbon ambition; and improve the resilience of people, buildings and places to climate change impacts. Conserve and enhance the natural environment to achieve environmental net gains; promote biodiversity; and support recovery and renewal of natural systems. Support the creation of greener places that bring nature closer to people and a greener built environment that supports efficient resource use. Contribute to a reduction in pollution and in exposure to pollution – supporting the ambition of achieving clean and healthy air and waterways. Enable improvements in mental and physical health; and a reduction in health inequalities.	The environment around us impacts on London's economic success ; mental and physical health; and the resilience of people and places to climate change. Planning helps in setting clear expectations and in supporting delivery of built and natural environments that promote liveability; inclusion and equality of opportunity; resilience; net zero carbon; and improved health for all. As London grows and densifies it is ever more important to enhance access to green space and ensure that planning, place-based approaches and design create a greener, resource-efficient, resilient and healthy city.

Draft London Plan Consultation – Closing Questions

Q36. If you are seeking any modification to the plan, please confirm whether you would wish to appear at the Examination in Public, if requested to do so by the Inspector. If so, we will pass your details to the Inspector who will decide whether to issue a formal invitation to you at a later date. The Inspectors themselves would set the dates that the hearing would be held.

- Yes
- No

Answer Q37 only if you have chosen 'Yes' to Q36.

300. Yes, the London Property Alliance wish to appear at the Examination in Public.

Q37. Please explain in the space below why you consider it necessary for you to attend the Examination in Public.

301. The Alliance 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. Given the importance and range of interests which the Alliance represents, and the comments which the Alliance has raised on the draft Plan, it would be appropriate for the Alliance to appear at the examination hearings.

Appendix A – Evidence Submitted

302. To support the Alliance's representations, a number of reports and documents are enclosed alongside this submission for consideration by GLA officers/the Inspector. These reports and documents are as follows:

- a) Cycling & the City Report, City Property Alliance, December 2024 (enclosed as separate report, accessed here: <https://www.citypropertyassociation.com/cycling-the-city/>)
- b) Space for Change: Office space dynamics in central London, Knight Frank, London Property Alliance, December 2025 (enclosed as separate report, accessed here: <https://www.londonpropertyalliance.com/space-for-change-office-space-dynamics-in-central-london/>)
- c) Space for Change: Office space dynamics in Central London. Westminster deep dive, Knight Frank, London Property Alliance, January 2026 (enclosed as separate report, accessed here: <https://www.westminsterpropertyassociation.com/space-for-change-westminster-deep-dive/>)
- d) Good Growth in Central London, Arup, London Property Alliance, 2024 (enclosed as separate report, accessed here: <https://www.londonpropertyalliance.com/good-growth-in-central-london-2/>)
- e) VuCity images, 2019 [to be inserted]
- f) Embodied Carbon in Central London, Arup, London Property Alliance, May 2026 (enclosed as separate report, accessed here: <https://www.londonpropertyalliance.com/embodied-carbon-in-central-london-2/>)
- g) The Cycle Storage Gap Report, Velocity, London Property Alliance, October 2026 (enclosed as separate report, accessed here: <https://www.londonpropertyalliance.com/the-cycle-storage-gap/>)
- h) LPA Headquarter Research (yet to be published)

[London Property Alliance to advise if any further reports or evidence should support/underpin representations]

Appendix B – Emerging London Plan Employment Projections – London Property Alliance Comments