



## **BPF RESPONSE TO THE GLA'S TOWARDS A NEW LONDON PLAN CONSULTATION**

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### **PREPARED AND SUBMITTED BY**

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## British Property Federation

1. The British Property Federation (BPF) represents the real estate sector – an industry which contributed more than £116bn to the economy in 2020 and supported more than 2.4 million jobs. We promote the interests of those with a stake in the UK built environment, and our membership comprises a broad range of owners, managers, and developers of real estate as well as those who support them. Their investments help drive the UK's economic success; provide essential infrastructure and create great places where people can live, work, and relax.
2. We welcome the opportunity to respond to this GLA consultation collecting early views on the next iteration of the London Plan. Our comments below reflect two member roundtables we ran during the consultation period.

## General comments

3. Members welcomed the references in the consultation paper to the intention of streamlining the next version of the London Plan, making it a shorter and more concise document. There has been a general view in recent years that the current version of the London Plan has moved away from its original intention as a strategic plan for the capital and instead has become an extensive development management plan, duplicating policy from both local authority and national levels. Any moves by the GLA to focus on addressing this fundamental issue would therefore be welcomed by the property sector.
4. Some members were stronger in their comments on the above. That is to say, the GLA's consultation paper reads as if the current London Plan is working effectively, which is far from the consensus view within the wider private sector. Members fed back that a better starting point for this early consultation on the London Plan would be to return to first principles and work from there. What are we trying to achieve through the London Plan? What were its original goals when it was first introduced?
5. Further general comments focused on the need for the future London Plan to have a strong focus on planning for economic growth and jobs, as well as greater housing delivery. Whilst the need to tackle the capital's housing growth is irrefutable, homes built without the necessary employment space delivered in parallel will not create sustainable communities. Our members would like to see a dual focus on planning for housing and employment together and feel this point requires greater emphasis in the consultation paper.
6. The references and themes in the consultation paper regarding the need for pragmatism if the GLA, local authorities, and the private sector are going to work together to make the next iteration of the Plan effective are very welcome. The BPF supports this argument but would note that pragmatism, in reality, would require a number of existing policies in the London Plan to be amended if pragmatism is to be delivered in practice.

7. However, this slowdown in housing delivery requires immediate attention. The viability challenges faced by developers- including escalating construction costs and regulatory complexities- are hindering housing development. The impact of new regulations, including building safety and rental reforms, has further complicated the viability and attractiveness of high-density developments. While not all these issues sit with the Greater London Authority (GLA), they need to be addressed as part of the GLA's holistic approach to housing development, particularly as London continues to aim for higher densities as part of its spatial strategy.
8. London has set an ambitious target of delivering 88,000 new homes per year. However, it has consistently fallen short of this goal in recent years. In 2023/24, only 33,000 new homes were built, and the lack of housing starts across multiple London boroughs in the first quarter of 2025 has been well documented.
9. As noted above, housing delivery in London is currently hampered by a range of challenges. These include delays at the Building Safety Regulator, an inefficient and under-resourced planning system, and broader viability issues, as outlined in response to paragraph 1.4.
10. This consultation presents an important opportunity for policymakers to factor in these challenges into its wider London Plan review. It should prioritise streamlining the next iteration of the London Plan and enabling a more flexible, responsive approach to its objectives moving forward.

## Chapter 1 – Introduction

### 1.4 Viability and Delivery

11. Development viability remains one of the key challenges to delivering projects in London and in many cities across the country. Alongside market and construction cost pressures, a range of policy and regulatory hurdles continue to impact deliverability and viability such as the current performance issues with the Building Safety Regulator, which are delaying urban residential and mixed use schemes from starting on site in London. Measures such as the future introduction of the Building Safety Levy in Autumn 2026 will also inevitably have a negative impact on development viability in time.
12. There has also been a clear trend in national planning policy in recent years towards the introduction of additional assessment requirements—such as Biodiversity Net Gain (BNG). While initiatives like BNG are supported, it is important to recognise the cumulative impact of successive planning policy changes on development viability and deliverability.
13. At the same time, local plans have become increasingly aspirational. In many cases, local policies set out competing requirements that can conflict or place unrealistic demands on schemes—further undermining viability.

14. A new London Plan should recognise this wider policy context and build in greater flexibility in the application of its policy objectives. We would also highlight the important role that government and the public sector can play in addressing viability and deliverability challenges. Increased public investment in affordable housing, infrastructure, and utilities will in turn help unlock greater levels of private sector investment in development.

## Chapter 2 – Increasing London’s Housing Supply

15. London has set an ambitious target of delivering 88,000 new homes per year. However, it has consistently fallen short of this goal in recent years. In 2023/24, only 33,000 new homes were built, and the lack of housing starts across multiple London boroughs in the first quarter of 2025 has been well documented.
16. As noted above, housing delivery in London is currently hampered by a range of challenges. These include delays at the Building Safety Regulator, an inefficient and under-resourced planning system, and broader viability issues, as outlined in response to paragraph 1.4.
17. This consultation presents an important opportunity for policymakers to factor in these challenges into its wider London Plan review. It should prioritise streamlining the next iteration of the London Plan and enabling a more flexible, responsive approach to its objectives moving forward.

### 2.1 A Brownfield First Approach

18. Redeveloping brownfield sites is critical to addressing the housing crisis without encroaching on undeveloped land. We agree that aligning this strategy with public transport accessibility is crucial to the success of high-density development; given the limited capacity in some transport corridors, it is essential to ensure infrastructure investments are carefully aligned with development plans to maximise efficiency and support investment.
19. We suggest the plan could more explicitly align with national policy, particularly paragraph 125(c) of the National Planning Policy Framework (NPPF), which stresses the importance of making effective use of brownfield land. Referring to this directly in the London Plan would reinforce the brownfield-first principle and ensure consistency across national and regional policies.

### 2.2 London's Call for Sites - LAND4LDN

20. We commend the Call for Sites initiative and the extensive engagement it has attracted. The data from this exercise is invaluable in understanding London's land supply and improving the evidence base for housing delivery.

21. However, we highlight the need for greater differentiation between residential typologies such as BtR, Purpose-Built Student Accommodation (PBSA), co-living, and other specialist housing types. Each of these has distinct characteristics, densities, and planning needs. Lumping all forms of residential use together risks misrepresenting what each site can deliver, leading to inaccurate output assumptions.
22. Additionally, windfall developments, including small-scale infill and changes of use, play a more significant role in London's housing market. The Plan should provide more flexibility to accommodate these types of developments, as they often make up a large proportion of housing delivery in the city. A more nuanced approach to modelling land supply would better capture the market.

### Paragraph 2.3 Opportunity Areas

23. We support the emphasis on Opportunity Areas (OAs) as a key strategy for housing and job growth in London. These areas, particularly when connected to transport infrastructure improvements, present significant opportunities for high-density development. The integration of land use and transport here is crucial, and we encourage the continued support for transport extensions to the DLR and Bakerloo Line to unlock potential.
24. However, we urge caution regarding the de-designation of Opportunity Areas. These designations attract long-term strategic projects and removing these designations without transparent, evidence-based rationale could create uncertainty and delay development. De-designation should be pursued only in specific cases where it is clearly justified.

### 2.4 Central Activities Zone

25. The Central Activities Zone (CAZ) remains an important part of London's economy and housing supply and we welcome acknowledgement of the scope to increasing housing delivery on CAZ, including through repurposing of office stock into housing.
26. However, mixed-use policies here need to be more flexible to the needs of the local area. In some boroughs, current policies may be too rigid, creating unintended consequences – for example, some boroughs have in place policies requiring housing alongside office developments above a certain size, which are neither viable nor practicable and result in developments being kept unnecessarily small to avoid triggering this requirement. This ultimately results in less valuable land use across both tenures. A more flexible approach would allow for mixed use that aligns with evolving market needs and facilitates the effective repurposing of office space into housing.

### 2.5 Town Centres and High Streets

27. The potential for town centres and high streets to contribute to housing supply, particularly in locations with good access to public transport, is a critical part of the Plan's strategy.

28. However, navigating strict mixed-use policies, as discussed in response to 2.4, can prevent effective use of land across multiple purposes.

## 2.6 Industrial Land

29. We note the consultation paper discusses the concept of industrial land swaps, whereby industrial land in inner London boroughs could be relocated to outer London boroughs so the overall level of employment land in the capital (in theory) would not be further eroded. Members fed back that these sorts of arrangements could work in specific circumstances — for example, in boroughs with excellent road connections and significant green belt land.
30. However, it was also noted that such a mechanism should not be relied upon to deliver a significant quantum of new homes in inner London boroughs. Industrial land swaps will inevitably require a significant amount of cooperation and collaboration between inner and outer London boroughs, which could prove problematic.
31. Members also fed back that industrial land swaps miss the point. It would be better for policymakers to focus instead on determining the right overall level of need for employment land in the capital, which has been significantly eroded in recent years. In reality, what could emerge is that industrial land swaps simply further the erosion of industrial land in London for housing, without additional increases in employment in tandem.
32. The tension between industrial land protection and housing delivery is a key issue in the London Plan. While co-location of homes and industrial uses has been proposed as a solution, it often results in compromises that undermine both housing and industrial functionality.
33. We support a more nuanced approach that clearly differentiates between types of industrial land and evaluates the feasibility of co-location on a site-by-site basis. This approach could include a more targeted strategy for London's 'grey belt', where housing needs could be met without impacting more vital industrial areas.

## 2.7 Wider Urban and Suburban London

34. The current wording of the paragraph could be clearer in setting expectations. It refers to the delivery of approximately 14,500 homes per year in these areas but does not set out what level of uplift is required to meet London's overall housing need under the new targets. Without this context, it is difficult to assess whether the current output is broadly on track or whether substantial policy interventions are needed to increase delivery from these areas.

## 2.8 Other Sources of Housing Supply

35. We appreciate recognition that Green Belt land may need to be reevaluated considering growing housing demand. However, there is an opportunity for the London Plan to be more expansive in its review of other types of land, such as Metropolitan Open Land and grey belt land. These areas may not always fulfil their strategic function, and some sites, particularly those underutilised or poorly performing in terms of public access and environmental value, could offer potential for well-designed development that both enhances public amenity and contributes to housing supply.

## 2.9 Beyond London's Existing Urban Area

36. Similar to the previous paragraph, the Plan could benefit from further clarification on how land beyond London's existing urban area will contribute to the housing strategy. Whether through re-designating certain areas or promoting sustainable development in peri-urban zones, it is crucial that the Plan embraces a more flexible and dynamic approach to land use.

## 2.10 Large-Scale Urban Extensions in the Green Belt

37. The BPF is strongly supportive of the London-wide green belt review outlined in the consultation paper. Members fed back that the key challenge for an effective review is how the GLA will enforce the findings of the review among outer London boroughs, which may be more resistant to changes locally on their designated green belt.
38. It should be noted that those authorities with significant green belt land are the ones likely to be allocated higher housing numbers in the Plan. As such, an effective London-wide green belt review — and crucially a mechanism through which all relevant authorities have to 'buy in' to the review — will be the only way the ambitious housing targets can be realised in practice.
39. On a similar note, the consultation also makes strong reference to the role of large-scale urban extensions in meeting the new ambitious housing targets. Again, an effective London-wide green belt review and buy-in from the relevant authorities will be crucial for this to be achieved in practice.
40. We support the use of Green Belt for large-scale urban extensions, particularly alongside improving public transport to ensure these new neighbourhoods are well-connected.
41. However, as large-scale developments in the Green Belt often involve complex planning and infrastructure challenges, a tailored policy approach is required that addresses these complexities.
42. Additionally, the definition of large-scale development as over 10,000 homes is unnecessarily large and may hinder development, as smaller (though still substantial) developments, such as those with 5,000 homes, can nonetheless meaningfully contribute to the overall housing target. Setting practicable thresholds and rules regarding what constitutes large-scale development would provide greater certainty for all stakeholders involved in planning, investment, and implementation.

## 2.11 Metropolitan Open Land

43. We support a more nuanced approach to Metropolitan Open Land (MOL) designations. While strategic protection remains essential, there are cases where certain MOL sites no longer fulfil their intended function or are underperforming in terms of environmental value or public access. In these instances, there may be an opportunity to consider small-scale, well-designed development that supports housing delivery while preserving public access and enhancing the surrounding environment. A review of MOL could open these opportunities and contribute to alleviating housing pressure while also considering broader public benefits.

## 2.12 Affordable Housing

44. The acknowledgment of the barriers to delivery of affordable housing, such as high interest rates and regulatory uncertainty, is welcomed.
45. However, the strategic approach to affordable housing supply in the Plan would also benefit from recognising the diversity of housing models that contribute to affordability, including BtR, co-living, and PBSA developments. Currently there often exists tensions between affordable housing thresholds set out in the Plan and those in borough's local plans, which further complicates the planning process. Ensuring consistency and single thresholds here is key and must be ensured.

## 2.13 Planning for Affordable Housing

46. We strongly support the Plan's commitment to improving the process for affordable housing delivery.
47. National planning policy recognises the role that BtR plays in delivering housing and its unique development model, setting it a lower threshold of 20% for affordable housing. The current Plan does not provide this recognition, and the existing Fast-Track Route (FTR) threshold of 35% is struggling to be met in this challenging development environment. We support the role of the FTR, but it must be subject to a pragmatic, apolitical approach that can account for challenging development conditions; to this end, we recommend a series of flexible thresholds for different uses, with a 20% threshold for BtR in line with national planning policy. Further, the FTR is often a drawn-out process for larger sites, undermining its purpose of providing an efficient planning route, and would benefit from being further streamlined and transparent.
48. Registered Providers are currently struggling to purchase s106 and social homes as they grapple with capital constraints and refurbishment of existing portfolios. The Plan should include a cascade mechanism to account for these situations, whereby affordable housing unable to be sold to Registered Providers can be converted into market housing and monetary contribution provided in place.
49. Early- and late-stage reviews are a deterrent for investment; our members report that some investors are unwilling to fund schemes as a result of the impact these reviews have on delivery. The calculation



methods and lack of consistency across boroughs must be addressed. Late-stage reviews in particular were introduced to incentivise faster delivery; in the BtR sector the motivation to build-out quickly is part of the business model, yet schemes are subject to lengthy reviews. We recommend the GLA address this through a review ahead of the development of the new Plan, working towards abolition or a significant change to calculations to ensure the process does not deter investment.

50. We believe that the intermediate rented market would greatly benefit from simplification. The most effective policy would be one intermediate rented tenure, provided that rent setting and annual increases are provided for and supported by a clear, consistent, and transparent formula. This would make the intermediate rented tenure more attractive to investors and could facilitate increased development of these homes to address the existing undersupply.
51. We note also that the Government is currently consulting on developer penalties relating to build out timescales. The BPF will be responding to this consultation, however, we note here our stringent opposition to this proposition, and the impacts that this will have on development and thus affordable housing supply.

## 2.14 Estate Regeneration

52. The regeneration of social housing estates is vital to ensuring that these areas remain fit for future generations. However, there is a need to go beyond simply replacing homes on a one-for-one basis. The policy should also consider the broader affordability of new homes, accounting for factors such as energy efficiency and overall tenancy costs. With the rising cost of living, especially energy bills, it is important that new homes remain affordable not just in rent but their long-term sustainability and running costs.
53. We urge the Plan to be more flexible in supporting estate regeneration, recognising that the process often involves multiple funding streams with differing timelines and requirements. A more adaptable approach would allow local authorities and developers to access the necessary resources more efficiently, ensuring that regeneration projects can progress smoothly and without unnecessary delays.

## 2.15 Build to Rent

54. We strongly welcome the recognition of BtR as a vital part of London's housing strategy; BtR has delivered over 55,000 London homes since 2012, with over 54,000 further homes currently in planning or construction. London BtR provides homes in high densities and typically houses more residents per room, thus providing genuine additionality and housing for more Londoners.
55. We believe the Plan should meaningfully recognise the contribution that BtR, and rental accommodation more generally, provides Londoners. BtR homes are not just for those who need to rent as they wait to get on the property ladder; BtR is increasingly popular as a long-term housing option as it provides flexibility, a sense of community, and high-quality management.

56. We disagree with the implication that BtR only caters to intermediate housing need. The sector provides homes to a diverse group of residents, including those on lower incomes; according to the GLA, between 2020-2022, BtR schemes delivered on average 34% affordable homes. Further, our latest *Who Lives in Build to Rent?* 2025 report found that resident ages vary from 16 - 65+, 25% of residents earn less than £32,000 p/a, and 11% of renters are employed in the public sector. Recognition of the diversity of BtR residents, and its potential to further increase, should be provided for in the Plan to facilitate further development of these much-needed homes.
57. We welcome the recognition that more diverse types of housing need to be supported. In line with this, co-living, an emerging BtR model, should be recognised in the Plan alongside BtR, as it provides high-density and high-quality homes, contributing meaningfully to housing additionality and providing Londoners with increased choice. Co-living also has a role to play in providing onsite affordable homes.

## 2.16 Other Housing Options

58. We welcome recognition of the need for delivery of specialist housing, and acknowledgement that this has not kept pace with changes in London's population. We discuss specialist housing for older people under paragraph 2.17.
59. However, we strongly disagree with the language used in this paragraph and in paragraph 2.18. This language ("crowding out", "dominating") implies that there is something inherently negative about co-living and student accommodation – this is not supported by evidence and plays into stereotypes about the residents that live in these developments. As is evidenced in housing data, co-living and PBSA make up a tiny fraction of housing in London and are nowhere near providing sufficient supply to meet the demand that exists. To suggest that they are thus 'dominating' areas is demonstrably false and would ground planning policy in incorrect and unsupported assertions.
60. These tenures (which often deliver much-needed housing in markets where other tenures are constrained) must be supported and encouraged if London is to meet its housing target.
61. We recommend consistency across London relating to the provision of affordable housing for these tenures; some boroughs seek this via payments in lieu, where others prefer delivery on site. Clear guidance from the Plan on this approach should be provided.

## 2.17 Specialist and Supported Housing and Housing London's Older Population

62. We strongly support policies that encourage the increased supply of older peoples' housing; in our [Building for Generations](#) report, we advocate for 10% of new housing supply to be older peoples' housing, and for this to be prioritised housing where need is identified.

63. Flexibility in specialist housing provision for older people is key, as is recognising the role of specialist housing in freeing up larger family homes, which can ease overall housing demand. The London Plan should be flexible in its design requirements, recognising that mobility concerns for older residents may supersede the need for other features like cycle storage. Moreover, specialist housing should not only focus on institutional care but create a diverse, adaptable housing market where different age groups and needs can coexist in balanced communities.

## 2.18 Purpose-built Student Accommodation and Other Forms of Shared Housing

64. As noted in our response to paragraph 2.16, we strongly disagree with the implied characterisation of both co-living and PBSA in this consultation.
65. Other UK cities are actively seeking to retain their students and graduates to support their local economies and drive growth – this consultation document does not appear to support the same ambitions, despite the benefits this would provide London. As the consultation notes, a holistic approach to housing is essential, including recognising the positive impacts that increased housing has on other areas. PBSA in particular supports London's universities, which are projected to train over 74,000 professionals and facilitate nearly 6,000 new companies and charities in the next five years. Sufficient housing is and will be essential in ensuring growing London businesses can attract and retain talent.
66. We do not agree that the Plan should seek to set a balance for boroughs with targets and site allocations – development should be broadly facilitated across London in all tenures; without this, London will struggle to meet its housing target. Allocations and scheme-specific details should be determined on a case-by-case basis and driven by need, not incorrect assumptions about the kinds of housing and residents these schemes create.
67. However, we support recognition that nominations agreements are a barrier to some PBSA schemes, and agree it is more appropriate for these to apply only to affordable student accommodation. We also welcome acknowledgement of the supported accessibility and wellbeing that co-living and PBSA provide.

## Chapter 3 – Growing London's Economy

### 3.4 Industrial Land

68. As noted in our general comments, members fed back that they would have liked to see more ambition on planning for employment growth in the consultation paper. How can the next iteration of the London Plan positively for employment growth, rather than simply being content with no overall net loss?

69. It was noted during our roundtable that perhaps more innovative thinking from both public and private sector stakeholders is needed. For expanding housing delivery in the capital, there are more tools at policymakers' disposal — for example, building denser residential development is an effective means to expand housing delivery when suitable brownfield land is finite.
70. However, innovation is much more challenging for industrial sites. There is discussion in the consultation paper about directing industrial development towards town centres, but for certain industrial uses such as data centres this simply will not be practical owing to issues such as security concerns. Modern logistics facilities also require service yards, which will likely not be able to be accommodated at the size and scale necessary in town centre locations.
71. Members also discussed the challenges of multi-storey industrial and logistics development in London at our roundtable. It was noted that culture change among tenants would be needed for this form of industrial to really take off — currently many tenants simply do not want to locate on upper floors of multi-storey logistics developments. It was also noted that in other parts of the world, such as the Middle East, multi-storey logistics receives much more backing in policy terms from government and relevant local bodies. As such, if the GLA and local authorities want multi-storey logistics to grow and thrive, they will need to back this form of industrial development and ensure this support is reflected in policy in the new London Plan and relevant local plans.

### 3.10 Affordable Workspace

72. Members fed back that the London Plan having a policy on affordable workspace is perhaps an example of where the current Plan has gone too far in terms of setting out policy. The London Plan should return to its original purpose of serving as a strategic framework for the capital and allow local authorities to develop their own policies in this sphere.

## Chapter 4 – London's capacity for growth and design quality

### 4.2 Tall Buildings

73. The BPF supports suggestions in the consultation paper that the next London Plan will be more proactive in identifying tall building clusters. We would also note that for taller residential schemes to fully contribute towards the ambitious housing targets, it is imperative that the current challenges and delays at the Building Safety Regulator are addressed; otherwise, dense urban development simply will not be built out at the pace required to address London's housing shortage.

74. Members also fed back that they would welcome clarity on what constitutes a tall building through the GLA's consultation exercise and future policy development for the new London Plan.

#### 4.7 Housing and Flatted Development

75. The BPF is supportive of the approach in the consultation paper focusing on dense flatted development as the primary vehicle through which the ambitious housing numbers for the capital can be achieved. We did receive some comments from members that policymakers should also look at local demand for different types of housing to ensure the market can sufficiently absorb this form of housing product. In certain housing markets, the delivery of houses instead of flatted development may be more appropriate given local demand.

## Chapter 5 – London's infrastructure, climate change and résilience

76. BPF members support high environmental standards and are committed to playing their part in tackling climate change. However, as the consultation paper notes, since the last London Plan the national Government has introduced a range of new regulations on energy, heating and cooling with more expected over the coming months and years. Given this, the next London Plan should simplify the policy and regulatory landscape by aligning with national standards where possible. This would provide consistency for developers and investors, reduce bureaucracy and maintain high sustainability standards. This includes in the areas below.

#### 5.1 Energy Efficiency Standards

77. BPF members would like to see energy efficiency standards in the next London Plan aligned with national standards.

#### 5.2 Heat networks

78. The BPF supports the proposal to align the next London Plan with the Government's heat network regulations and remove duplication with national requirements. This includes expected legal requirements to require many types of new and existing buildings to be connected to heat networks (heat network zoning).

79. BPF members have previously highlighted concerns about being required to connect new buildings to existing gas-fired heat networks. We would like to see flexibility on connections which recognises our members commitment to delivering all-electric net zero carbon buildings.

### 5.3 Whole Life Carbon

80. We support measures to reduce emissions from new developments but would like to see a more coherent and consistent approach in how local authorities – across London and across the UK - approach whole life carbon.
81. This includes on decisions around retrofit and redevelopment. Like many in the industry, the BPF supports a “retrofit first not retrofit only” approach, where retrofit is the preferred option but redevelopment is accepted where the economic, environmental and social benefits outweigh the potential carbon impact.
82. Any new policies in the next London Plan should align to any new regulations or guidance on whole life carbon issues by national Government.