

GLA call for evidence on Towards a new London Plan

Section 2: Increasing London's housing supply

Introduction

1. Section 2: Increasing London's housing supply

If you have any comments, please add them here.

We welcome the Mayor's ambition to increase housing supply in the capital.

Both the GLA and London boroughs will need to be sufficiently resourced to deal with an increased volume of applications, even more so given Government's planning reforms and the pro-housing-supply measures in June's Spending Review.

Flexibility in the application of planning rules will also be key if London is to hit its increased housebuilding targets. Rigid application of certain policies by boroughs can lead to schemes being unnecessarily refused, slowing the delivery of much-needed new housing. A greater degree of discretion would be especially helpful for things like private amenity space, parking, electric vehicle charging points, cycle storage and refuse storage. To that end, we recommend the flexibility offered by the document "Accelerating Housing Delivery – Planning and Housing Practice Note December 2024" should be incorporated into the new London Plan.

Other interventions which may help support the intended increase in housing supply include:

- Development of a London-wide parking standard to ensure consistency across boroughs and offer certainty for developers when preparing housing schemes
- A requirement for the GLA and boroughs to publicise relevant standards and make them easily accessible to help guide developers when designing new schemes
- A London-wide requirement for case officers to work proactively with developers by negotiating to resolve issues and deliver approvals (in accordance with paragraph 39 of the NPPF). Negotiation shouldn't only take place where a developer has entered into pre-application discussions.

Paragraph 2.1: A brownfield first approach

3. Paragraph 2.1: A brownfield first approach

If you have any comments, please add them here.

We support the principle of a brownfield-first approach. The following should be considered to maximise use of brownfield sites:

- Reducing and standardising the need to market commercial properties for lengthy periods to demonstrate redundancy. Current policies range from 12 months to 24 months meaning developers must wait up to two years before an application can be submitted when a commercial unit is disused
- Reducing the level of scrutiny where evidence of marketing is prepared with the input of a commercial property specialist. This process currently causes delays and generates unnecessary appeals
- Removing the need for employment and skills strategies/contributions when redeveloping commercial sites under certain circumstances – for example where the marketing evidence demonstrates genuine redundancy and/or where the scheme is being delivered as 100% affordable housing

Paragraph 2.2: London's call for sites - LAND4LDN

5. Paragraph 2.2: London's call for sites - LAND4LDN

If you have any comments, please add them here.

We note the supporting text indicates that the sites submitted to date include existing permissions for over 250,000 homes. While we see this as positive, the London Plan should primarily be focused on allocating new sites, which don't yet have planning permission. These cover a variety of sizes to encourage more developers to come forward to deliver schemes in both the short and longer term.

The Plan's focus should then be on working with developers and site owners on the existing planning permissions for the 250,000 permissioned homes, to help them deliver these schemes. One approach could be to issue surveys to landowners to identify the issues preventing build-out of these sites. Where the issues are financial or viability related, discussions could be instigated to re-negotiate s106 requirements (where applicable) or Community Infrastructure Levy (CIL) charges.

Removing or reducing all but the essential financial obligations and the need for affordable housing reviews from these schemes could help to improve viability, provide certainty regarding developers' returns and ensure schemes are delivered.

Paragraph 2.3: Opportunity Areas (OAs)

7. Paragraph 2.3: Opportunity Areas

If you have any comments, please add them here.

We support the review and streamlining of Opportunity Areas. To be successful, Opportunity Areas must embed long-term governance, accountability, and placemaking

from the outset. Partnerships between the public and private sector, backed by organisations capable of convening local authorities, infrastructure providers, and the GLA, will be essential. We see value in exploring an independent delivery body, such as a Mayoral Development Corporation, where appropriate.

Early investment in infrastructure and social facilities will require government support and land value capture mechanisms to de-risk delivery and support long-term stewardship. Engagement must begin with local principles and cultural insight, with design consultation at a neighbourhood level.

The Plan rightly acknowledges that fully realising the housing potential of Opportunity Areas will depend on delivering key enabling infrastructure, such as the proposed DLR extension to Thamesmead and Abbey Wood, and the Bakerloo Line extension. These areas offer the scale and strategic location to support significant new housing. But they also require coordinated investment and mechanisms beyond the planning system to overcome longstanding delivery barriers.

We welcome the Plan's support for New Towns as a strategic solution to London's housing crisis and agree they must be targeted in areas where they can deliver the greatest social and economic benefits. Thamesmead exemplifies this potential – its scale, location, and public landownership present an opportunity to deliver large-scale, sustainable regeneration that responds directly to London's acute housing need. Continued focus and investment here is essential, and we encourage the GLA and Taskforce to explore additional sites with similar capacity to drive long-term growth and inclusive place-making across the capital.

Paragraph 2.5: Town centres and high streets

11. Paragraph 2.5: Town centres and high streets

If you have any comments, please add them here.

We agree town centres should be a focus for new housing delivery. The London Plan should encourage mixed use developments in town centres and offer support for converting the space above existing business (Class E) floorspace to residential.

As mentioned in our response to Q1, greater flexibility is required regarding certain standards to facilitate the conversion of upper floors of business space to residential. For example, removing the requirement for private amenity space for conversion schemes in town centres. This could help to deliver more housing in town centres in the short term.

CIL rates should also be reviewed in town centres. Setting rates too high for business type uses could potentially discourage some developers from delivering mixed use schemes, instead preparing viability arguments for all residential schemes. This could cause delays to decision-making while boroughs assess viability, while also having a harmful impact on the vitality of town centres.

Paragraph 2.6: Industrial land

13. Paragraph 2.6: Industrial land

If you have any comments, please add them here.

From our recent experience of delivering a site in the Charlton Riverside area, the co-location of industrial and residential uses can bring a number of challenges. We've had difficulty agreeing specifications for glazing, balconies and future management of complaints because the noise assessments are based on the current situation rather than the situation following the regeneration of the wider area.

These challenges are symptomatic of broader difficulties building out the first scheme within a regeneration area. Developers may be discouraged from building out the first scheme in a regeneration area due to the difficulty addressing noise in the short term. They may wait for other schemes to commence and/or for the situation to change, before going ahead with their scheme. This slows down the delivery of schemes and the wider regeneration of the area.

Given these challenges, we recommend policies allowing for co-location should be part of a wider masterplan focusing on the long-term regeneration of the area. Greater flexibility should be applied regarding noise levels on the basis the area will be changing over time and the situation will improve.

Paragraph 2.7: Wider urban and suburban London

15. Paragraph 2.7: Wider urban and suburban London

If you have any comments, please add them here.

We consider that other parts of London have a great deal of potential for delivering more homes. A more consistent approach across all boroughs would help ensure certainty for developers and unlock the potential of these areas.

Croydon Council previously had a policy of intensification in areas outside town centres (Suburban Design Guide Supplementary Planning Document (SPD2)). This document helped deliver a large number of homes outside town centres. However, it was revoked in 2022 when the Council switched from Labour to Conservative control. A similar approach on a London-wide basis could deliver a larger number of homes across Greater London.

Paragraph 2.8: Other sources of housing supply

17. Paragraph 2.8: Other sources of housing supply

If you have any comments, please add them here.

We welcome the commitment to actively explore the release of parts of London's green belt for development. We've called for a sensitive, evidence-based review of London's

green belt for many years, so see this as a positive step towards meeting the capital's housing needs.

To maximise the effectiveness of the review, we believe there should be a requirement for boroughs to act on its outcomes. Such a requirement would maximise opportunities for delivering more homes, increase certainty for developers and reduce local opposition.

Paragraph 2.9: Beyond London's existing urban area

19. Paragraph 2.9: Beyond London's existing urban area

If you have any comments, please add them here.

Please see our response to Q17. As with the wider green belt review, there should be a requirement for boroughs to follow the recommendations arising from the review relating to Grey Belt.

Paragraph 2.10: Large-scale urban extensions in the green belt

21. Paragraph 2.10: Large-scale urban extensions in the green belt

If you have any comments, please add them here.

We welcome the fact the GLA is considering large-scale urban extensions in the green belt alongside the delivery of new public transport. This would help deliver more homes where they are most needed and improve all Londoners' access to a quality transport network. Greater flexibility should also be considered and reinforced for schemes delivering greater levels of affordable housing, in line with Government's Golden Rules for green belt development.

Paragraph 2.11: Metropolitan Open Land

23. Paragraph 2.11: Metropolitan Open Land

If you have any comments, please add them here

We welcome the review of Metropolitan Open Land (MOL) and the potential for some sites to deliver new homes and public open space. Consideration should be given to consulting private landowners (e.g. owners of golf courses) at an early stage in suitable areas as there may be an opportunity to allocate sites in the short term as part of the current London Plan review. These landowners may not be familiar with the plan-making process and, therefore, not aware their land has development potential.

Paragraph 2.12: Affordable housing

25. Paragraph 2.12: Affordable housing

If you have any comments, please add them here.

The consultation document correctly acknowledges the multiple barriers to affordable delivery that have emerged in recent years. Our own development programme has slowed substantially as we have faced various issues including sub-inflation rent rises and much increased spending on the safety, security and comfort of our existing homes. These have weighed down heavily on our EBITDA-MRI cash interest cover, preventing us from taking on additional borrowing for new development. The result is that, while we'll build out our 3,700-home contractually committed newbuild programme, we won't start any additional homes in London or elsewhere until our cash interest cover has recovered towards the end of this parliament.

Therefore, we were very pleased to see national government put a package of measures in place to accelerate the delivery of affordable housing in June's Spending Review. While much of the detail – including the split of grant funding between Homes England and the GLA – is still to be finalised, we're optimistic the package of measures could allow us to resume our development programme earlier than planned.

Paragraph 2.13: Planning for affordable housing

27. Paragraph 2.13: Planning for affordable housing

If you have any comments, please add them here.

Section 106

June's Spending Review addresses some of the underlying reasons for the slowdown in housing associations' purchases of s106 homes, most notably by boosting the sector's financial capacity. But there are other reasons too for the slowdown, including concerns around payment terms, future-proofing and delivery timings from private housebuilders. Therefore, more action is needed, and we hope the G15's Building Together, Building Better report on which the GLA collaborated can offer some insights into what policy solutions might be effective.

Threshold approach to viability

The Mayor's threshold approach to viability has helped make the viability process more consistent and transparent, while also increasing the speed of the planning process. Being linked to affordable housing provision, it has also helped to increase the level of affordable housing secured in new developments and embed the requirement for affordable housing into land values. Given those multiple benefits, we would welcome any move to have the threshold applied more consistently across all boroughs.

That said, there are areas in which the threshold approach could be tweaked to optimise outcomes.

One important consideration is how the threshold interacts with grant availability rules for sites acquired by registered providers with extant planning permission. A high affordability

threshold means RPs benefit less from delivering a greater proportion of affordable homes than specified in the original section 106 agreement. In the case of schemes converted to 100% affordable, providers may not be able to secure grant for any of the affordable homes. Therefore, in these circumstances, providers may prefer to deliver the specified or policy-compliant level of affordable housing rather than that encouraged by the threshold approach.

We also believe late-stage review mechanisms should only be imposed where they are considered to be absolutely necessary (e.g. the most viable schemes) to help reduce uncertainty and increase the supply of new housing. Please also see also our response to Q5. Where they are imposed, standard wording should be used to confirm that they do not apply to schemes delivered by registered providers. This would allow RPs to acquire sites with planning permission and deliver them without the need to undertake a review and/or apply for Deeds of Variation (DoV) to s106 agreements, which can cause delays to the delivery and occupation of new affordable homes and increase case officers' workloads.

Affordable housing requirements for green belt development

We recommend the GLA mirrors national policy in requiring schemes delivered on green belt land to deliver 15% more affordable housing than specified in the current local plan, capped at 50%. A universal 50% target may be counterproductive in low value areas as it may deter some development from coming forward on viability grounds. The issue is exacerbated in cases where registered providers acquire sites with extant planning permission as noted above in relation to the threshold approach to viability. That's because a high affordability threshold means registered providers benefit less from the delivery of "additionality" (the proportion of affordable homes delivered above the threshold secured in a s106 agreement). Depending on local restrictions, certain types of affordable housing secured in s106 agreements may not benefit from grant.

Extra flexibility may also be needed to accommodate for higher construction costs on previously developed land (for instance, those associated with site decontamination). One solution might be to exempt all previously developed land from both s106 and CIL contributions. This could lead to a large increase in developments coming forward, while also supporting the GLA's brownfield-first ambitions.

A greater emphasis on social rent

We would welcome greater emphasis on the delivery of homes for social rent. Social rent is the tenure for which there is most acute need, but also that requiring the greatest subsidy. On many schemes, RPs are unlikely to see a sufficient return to justify the delivery of large levels of social rented homes. Therefore, grant levels and/or land value capture mechanisms will need to be adequate to support any increase in delivery.

Review of threshold requirements

We also welcome that fact that consideration is being given to incentives to encourage affordable housing as well as the 10-unit threshold. Increasing the threshold for the provision of affordable housing should help bring forward more housing on small sites, which will encourage small and medium size housebuilders to deliver more homes. This

will help increase the range of housing being offered and make delivery more resilient by removing some reliance on large scale housebuilders.

Paragraph 2.14: Estate regeneration

29. Paragraph 2.14: Estate regeneration

If you have any comments, please add them here.

We support the ambition for estate regeneration schemes to replace social rent floorspace, regardless of residents' individual right to return.

However, full replacement of social rent homes is likely to create viability issues, particularly for high density schemes where there is little or no opportunity to generate cross-subsidy by incorporating homes for market sale. Even where homes for market sale can be provided, housing associations face a revenue loss during the decant, demolition and rebuild stage. Therefore, sufficient grant levels will be required for any scheme requiring 100% social rent replacement.

There is also an important distinction between floorspace (the focus of the current London Plan) and homes (the terminology proposed here). Housing need changes over time and it may be that the current composition of an estate is no longer suitable for current and future occupants. For example, it may be that an estate comprises predominantly one-and two-bedroom homes, whereas the current need is for a greater share of larger family homes. These inevitably require more floorspace, potentially creating difficulties in re-providing the original number of homes if space is constrained. Where it is possible to provide a greater proportion of family-sized homes within the original total, the additional floorspace will cost more and require extra grant.

Separately, the policy emphasis over recent years has been on using estate regeneration to deliver mixed tenure, balanced communities. Subject to available space and the original tenure mix of the estate, the proposed policy may mean it's not possible to create mixed communities if there is a need to replace all social rent homes.

Paragraph 2.15: Build to rent

31. Paragraph 2.15: Build to rent

If you have any comments, please add them here.

We welcome the fact the GLA is considering lowering the Build to Rent threshold and enabling the provision of genuinely affordable housing as part of Build to Rent developments.

Lowering the threshold would help ensure more small-scale developers are able to deliver Build to Rent schemes. This would speed up the delivery of rented products alongside other types of housing.

Paragraph 2.16: Other housing options

33. Paragraph 2.16: Other housing options

If you have any comments, please add them here.

We welcome the GLA's intention to increase choice and meet people's specific needs. As mentioned in previous responses, this could be achieved by introducing greater flexibility regarding the application of certain policies and introducing incentives for certain types of development.

The same can be applied to other types of housing to ensure the right level and type are delivered in the right locations to meet local need. For example, reducing CIL rates and s106 obligations for student accommodation in areas around universities and colleges. Combined with careful use of Article 4 directions, this could help deliver better quality student accommodation in the areas well related to educational institutions.

Paragraph 2.17: Specialist and supported housing and housing London's older population

35. Paragraph 2.17: Specialist and supported housing and housing London's older population

If you have any comments, please add them here.

We favour a London-wide approach to assessing demand for specialist accommodation.

As part of this approach, a distinction should be made between purpose-built specialist accommodation and conversions. Where a conversion from a dwelling to a C2 type use is proposed, this could result in the loss of housing stock. Local need should be considered where this is the case.

One possibility may be to prepare a London-wide strategic policy to ensure C2 type uses are delivered in appropriate locations, followed by a second part focusing on conversions which requires local need to be taken into consideration.

Consideration also needs to be given to Government funding for specialist accommodation. Greater availability of funding for this type of accommodation through London's share of the next Affordable Homes Programme would help increase delivery. It would also release existing stock for general needs use, as people move from their existing home to more appropriate accommodation for their needs.

We also recommend the Mayor lobbies against Government's proposed supported housing licensing regime. The licensing proposals risk discouraging new supply and jeopardising the viability of some existing services by imposing unnecessary licensing and compliance costs on housing associations. Proposals to introduce a dedicated supported

housing planning use class could also make it more difficult to switch buildings between classes as need / demand changes.

Paragraph 2.18: Purpose-built student accommodation and other forms of shared housing

37. Paragraph 2.18: Purpose-built student accommodation and other forms of shared housing

If you have any comments, please add them here.

Please see our response to Q33.

Section 3 - Growing London's Economy

Introduction

1. Section 3: Growing London's Economy

If you have any comments, please add them here.

We welcome the intention to reflect the new Class E use class in the London Plan. In doing so, it is important to ensure the flexibility offered by Class E isn't reduced. The London-wide policy should, therefore, discourage boroughs from imposing conditions restricting movement between uses when approving new Class E uses and the use of Article 4 Directions.

Paragraph 3.1: The Central Activities Zone

3. Paragraph 3.1: The Central Activities Zone

If you have any comments, please add them here.

We support the principle of amending the CAZ boundary to exclude predominantly residential areas. This should help make the CAZ more compact, which will help it recover whilst releasing some land for alternative types of development including housing. The amendments may also help to address noise conflicts between residential and business type uses.

It would be helpful if there were a set definition of what constitutes affordable workspace across London, for example 80% of market rent. If an alternative to 80% of market rent is used, the rate needs to be competitive and therefore there should be flexibility for it to change in response to market conditions.

Clear guidance should be provided on how to calculate market rent (e.g. by providing three examples of nearby similar properties) or the alternative approach to defining

affordable workspace. This would increase certainty for the boroughs and developers and ensure rental incomes are more in line with current rates.

Paragraph 3.3: Town centres and high streets

7. Paragraph 3.3: Town centres and high streets

If you have any comments, please add them here.

We support the adoption of a flexible approach to town centre uses – please see our response to Q1 of Section 3. Flexibility is likely to be the best way of ensuring town centres remain viable by providing opportunities for changes of use in response to market conditions. The use of conditions and s106 agreements should be limited and only applied when absolutely necessary to maintain flexibility and speed up decision-making.

Paragraph 3.9: Access to employment

19. Paragraph 3.9: Access to employment

If you have any comments, please add them here.

Housing associations are well placed to support inclusive growth, skills development and employment support across London, drawing on our networks and connections across a range of sectors and industries. Our developments create jobs in construction and long-term housing management, and we support the principle of planning obligations that deliver wider social and economic benefits, including employment and training opportunities.

We would welcome a London-wide brokering arrangement to support skills development by coordinating training pathways and enabling practical on-site experience across multiple development sites. A more consistent offer across boroughs would help address sector-wide skills shortages and ensure local residents can access employment opportunities linked to housing delivery.

However, developer contributions to support employment and training must be approached strategically and transparently, ensuring they are balanced appropriately alongside affordable housing and infrastructure obligations. A clear, pan-London framework for prioritising and pooling contributions would give delivery partners greater certainty while helping to align housing, skills and growth objectives.

Paragraph 3.10: Affordable workspace

21. Paragraph 3.10: Affordable workspace

If you have any comments, please add them here.

Please see our response to Q3 of Section 3.

Section 4 - London's capacity for growth and design quality

Introduction

Paragraph 4.1: Building height and scale

1. Paragraph 4.1: Building height and scale

If you have any comments, please add them here.

The focus on mid-rise and small site development is welcome, especially if supported by a simplified small site design code. This could unlock land around housing estates for mixed use schemes that combine new homes and flexible business space, helping support local economies and SME-led growth. However, height policies must remain sensitive to existing communities.

Any guidance should be clear and concise with a degree of flexibility. This would help ensure that small and medium size developers are not discouraged or overburdened by planning requirements. We also suggest linking building height and scale to public transport accessibility in a similar way to density – see also our responses to Q5 of Section 4.

Paragraph 4.3: Supporting a denser London linked to transport connectivity

5. Paragraph 4.3: Supporting a denser London linked to transport connectivity

If you have any comments, please add them here.

We support a London-wide approach to density and for it to be linked to public transport accessibility. This should ensure denser development is delivered within the areas with the greatest capacity for new development in accordance with paragraph 129 of the NPPF. Improvements to existing transport infrastructure and service frequency are also welcome. However, careful consideration needs to be given to resources and the availability of Government funding to ensure this is realistic and deliverable and delivers the desired outcome of bringing forward more development.

Paragraph 4.4: London's heritage

7. Paragraph 4.4: London's heritage

If you have any comments, please add them here.

We would warmly welcome a new policy supporting the sensitive adaptation and retrofit of London's historic buildings. Heritage and traditional homes are among the most difficult

to decarbonise for a number of reasons. Difficulties include the location of homes in conservation areas, which restricts the range of permissible retrofit measures, and inconsistency in the application of planning guidance between and within local authorities. Therefore, a new policy could play an important role in enabling sensitive retrofitting of historic buildings.

Paragraph 4.5: Designing the homes we need

9. Paragraph 4.5: Designing the homes we need

If you have any comments, please add them here.

Please see our response to Q3 of Section 2.

Paragraph 4.6: Heat risk, ventilation and overheating

11. Paragraph 4.6: Heat risk, ventilation and overheating

If you have any comments, please add them here.

We agree with the proposal to remove bespoke policies covering overheating and ventilation. The updated building regulations including approved document O adequately address these issues and should be referenced in the London Plan to achieve consistency.

Detailed overheating modelling should be an enforced requirement with low maintenance passive measures prioritised.

Multi-function heating / cooling systems may have a larger benefit and compare favourably to the CapEx (Capital Expenditure) and OpEx (Operational Expenditure) of separate systems.

Ceiling fans should also be considered as an alternative low-cost mitigation measure.

Paragraph 4.9: Space standards and other requirements

17. Paragraph 4.9: Space standards and other requirements

If you have any comments, please add them here.

Requirements on ceiling heights could perhaps be aligned with the Nationally Described Space Standard (NDSS) if mechanical ventilation is being provided to dwellings. This may increase development viability in taller buildings and where considerable ceiling void depth is required for mechanical building services.

Some flexibility would also be beneficial in the relation to space standards more generally. For example, where a proportion of units in a scheme meet the NDSSs, this could be

deemed acceptable, provided the bulk of the scheme complies with the more prescriptive standards set by the London Plan.

Paragraph 4.10: Designing for everyone

19.Paragraph 4.10: Designing for everyone

If you have any comments, please add them here.

We support the principle of designing for everyone, but there is a need for clarity around how this is defined and integrated within the existing planning framework. For instance, the suggestion large planning applications could be required “to demonstrate how they have been meaningfully informed by a range of lived experience” seems both vague and onerous. Without a clear and shared understanding, there is a risk that interpretation will vary across boroughs, potentially leading to inconsistency, delays, and additional burdens for applicants.

Section 5: London's infrastructure, climate change and resilience

Introduction

1. Section 5: London's infrastructure , climate change and resilience

If you have any comments, please add them here.

We support aligning infrastructure planning with housing and business growth. Provisions for sustainable transport, energy efficiency, and green infrastructure are vital to support community hubs and employment spaces within residential schemes.

Paragraph 5.1: Energy efficiency standards

3. Paragraph 5.1: Energy efficiency standards

If you have any comments, please add them here.

Having different standards and performance metrics within the London Plan, Future Homes Standard and local plans is not desirable.

We favour leaving energy efficiency to the new national standards. However, we recognise it may be justifiable in some cases to have standards exceed those in the Future Homes Standard due to the unique characteristics of the capital.

PV utilisation should be a defined metric and not simply an overprovision of PV to offset carbon production.

As a general principle, carbon reduction measures should not exacerbate fuel poverty for residents.

Paragraph 5.2: Heat networks

5. Paragraph 5.2: Heat networks

If you have any comments, please add them here.

We welcome the proposed new government regulation of the heat network industry. The Heat Network Technical Assurance Scheme (HNTAS) appears to be a robust way of ensuring the quality of heat network delivery for clients and residents.

We also welcome heat network zoning, but caution greater clarity on heat cost and on-site heat resilience is required on a project-by-project basis.

The viability of communal heat networks and the technologies contained within should be assessed in greater detail at the planning stage, in alignment with CP1 or any new technical standard that may replace it.

The overlap between planning energy strategies and incoming HNTAS requirements needs to be reviewed in detail.

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

7. Paragraph 5.3: Whole life-cycle carbon (WLC) and Circular Economy (CE)

If you have any comments, please add them here.

Whole Life-Cycle Carbon and Circular Economy benchmarks would be beneficial to support planning proposals and offer clearer guidance.

Paragraph 5.16: Fire safety

33. Paragraph 5.16: Fire safety

If you have any comments, please add them here.

We would welcome any attempts to remove the overlap of planning policies and building regulations. Safety standards should be consistent across the board, aligning with building regulations and not region-specific.

Policy D5 B5 in particular has been challenging whilst the lift industry and Fire Engineering industry seems unprepared or unable to meet this challenging requirement. BS EN 81-76 may resolve this when issued. However, this should definitely be a key consideration for both the London Plan and the LFB.