

Embedding resilience

Ramboll says we must act now to embed resilience into the future of our cities

The impact of climate change is no longer a future threat. It's here. And it's having an impact on our everyday lives. From extreme heat affecting transport networks to flooding placing pressure on utilities and urban infrastructure, the UK has already entered a new era where resilience is no longer a buzz word or superficial policy or corporate ambition, but a core requirement for economic security, national resilience and community wellbeing.

The question facing planners, policymakers and infrastructure leaders is not whether we must adapt but how quickly and sustainably we can embed resilience into the systems that shape our towns and cities.

At Ramboll's recent Resilient Societies event in London, delivered in partnership with the Resilient Cities Network, leaders from government, infrastructure, finance, transport and energy came together to discuss precisely that challenge. What became clear is that building resilience is not simply an engineering problem. It is fundamentally a governance and collaboration challenge.

And that means the planning system sits at the centre of the solution.

Planning Reform a critical opportunity

The UK is currently undergoing the most significant planning reform in over a decade. Through the Planning and Infrastructure Act and revisions to the National Planning Policy Framework (NPPF), the government is seeking to accelerate the delivery of housing and critical infrastructure as part of its ambition to deliver around 1.5 million homes and major infrastructure projects during this Parliament.

These reforms are designed to address a system that has often struggled to deliver the scale and pace of development required. Alongside the UK's ambitious Industrial and Infrastructure strategy, these reforms present a critical opportunity. If implemented effectively, this new planning framework could allow resilience to be embedded much earlier in the development process – at the point where decisions about infrastructure, housing and urban growth are made.

Embedding Resilience into Planning

Over the past two decades working across national infrastructure policy and major public sector programmes, and through my own experience

serving as a local councillor in Slough on the planning committee, I have seen first-hand how planning decisions shape the long-term resilience of our communities.

Planning is where housing growth meets energy infrastructure, where transport networks connect communities, and where environmental risks must be balanced against economic development.

Every planning decision today is, in effect, a resilience decision. If resilience and whole system thinking is not embedded at the planning stage, the cost of retrofitting our infrastructure later will be significantly higher. The current wave of planning reform therefore creates a critical moment to rethink how resilience is integrated into national policy, local plans and development frameworks.

Collaboration is essential

One of the strongest messages emerging from Ramboll's resilience discussions was that no single institution can deliver resilience alone.

The systems that underpin modern society energy networks, water infrastructure, transport systems, digital connectivity and the built environment are deeply interconnected. That means decisions taken by one sector inevitably affect another.

Resilience therefore depends on stronger collaboration between local authorities, central government, infrastructure operators, investors and insurers and, more importantly, communities who are impacted by climate change on the ground

Lord Toby Harris, who has long championed the UK's resilience agenda, highlighted during our event that many of the risks facing society remain insufficiently understood or communicated. Building resilience requires far greater transparency about these risks and stronger coordination between institutions responsible for managing them. In other words, resilience requires whole system thinking.

Cities as Critical Infrastructure

Cities themselves should be viewed as critical infrastructure. Urban areas concentrate economic activity, population and infrastructure — but they also concentrate risk.

At the Ramboll event, Cassie Sutherland from C40 Cities highlighted how cities across the world are already deploying solutions that reduce climate risk and strengthen resilience. These include green corridors to reduce urban heat, redesigned streets to

Rayman Bains,
Ramboll UK and Ireland



manage stormwater, and integrated planning approaches that connect transport, housing and energy systems.

Many of these solutions already exist.

The challenge now is scaling them through policy, planning frameworks and investment models. Cities that succeed in doing this will not only reduce climate risk but will also become more competitive and attractive places to live and invest.

Resilience requires Long-Term Thinking

Perhaps the greatest challenge in embedding resilience into planning is the tension between long-term infrastructure decisions and short-term political cycles.

Resilience requires decisions that look decades ahead – well beyond electoral terms or annual funding settlements. Yet the cost of failing to act is growing. Extreme weather, energy system pressures and infrastructure disruption will increasingly affect productivity, insurance markets and the viability of development.

Forward-thinking governments and cities must therefore treat resilience not simply as an environmental issue but as a core economic and national infrastructure priority.

From Policy to Delivery

The UK now has a significant opportunity.

Planning reform, infrastructure investment and the national drive to accelerate development can together create a planning system that delivers not only growth, but resilient growth.

But this will only happen if resilience becomes embedded across policy, planning frameworks and infrastructure delivery. It requires collaboration across government, industry and communities. And above all it requires long-term thinking. Because ultimately resilience is not just about surviving future shocks. It is about designing cities and infrastructure systems that allow society to thrive despite them. ■

Build-to-Rent single family housing

Build-to-Rent single family housing is a growing UK trend which London struggles to deliver, says Elisabeth Pywell

Build to Rent (BtR) Single Family Housing (SFH), defined as homes developed for long term rent rather than sale, continues to rise as a significant sub-sector within the UK housing market. According to Savills, SFH accounted for 51% of total investment into BtR in 2025; a 28% increase from 2024. This signals a shift away from multi-family BtR (MFH) - purpose-built apartment blocks developed for long-term rental.

Several market forces underpin this change. MFH has been hit by rising build costs, and ongoing regulatory delays, factors that have extended development timeframes and introduced additional uncertainty. In contrast, SFH schemes, typically comprising one to 2.5 -storey homes with simpler construction processes and capable of being delivered in phases often

present more predictable build timelines and risk profiles. Consequently, they have become increasingly attractive to investors seeking stability, quicker delivery, and reduced exposure to the regulatory complexities affecting taller buildings.

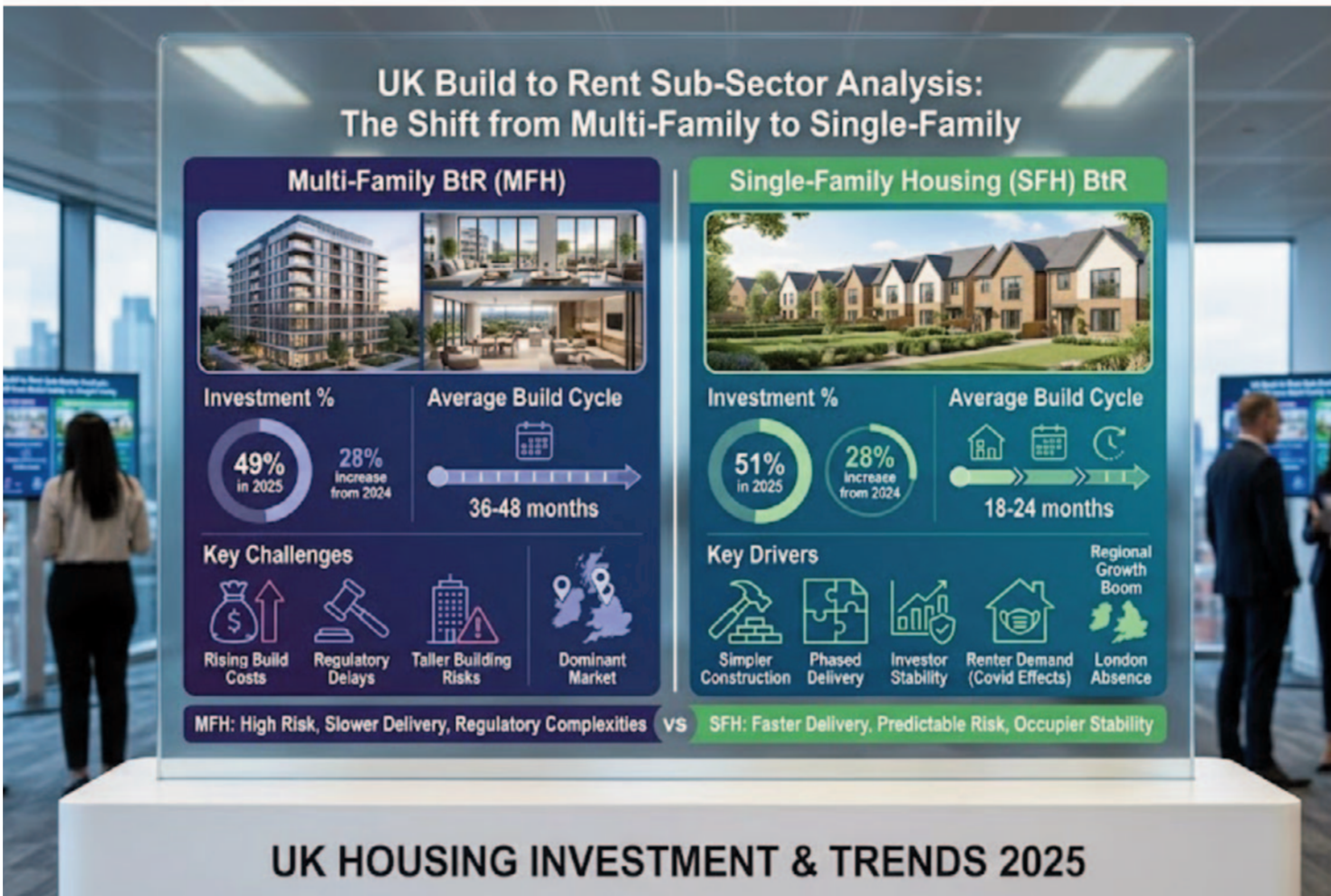
Space, stability and flexibility: Changing renter priorities

The rise of SFH can't just be attributed to investor behaviour and market conditions. SFH and MFH serve different stages of the occupier lifecycle and there has been a shift in occupier demand and requirements. Many reports attribute these shifts to the residual effects of the Covid-19 pandemic, which recalibrated how people valued the space, privacy and functionality of their homes.

Elisabeth Pywell is an Associate Director at Nexus Planning



SFH BtR developments offer a greater sense of autonomy, security, and long-term stability. Many operators offer longer lease options, reflecting the desire of families and long-term renters to establish roots in their communities. The sense of space, privacy, and independence provided by SFH has the potential to resonate with occupiers who are seeking >>>



>>> suburban living.

Beyond lifestyle factors, broader social and economic trends are shaping demand. Affordability pressures remain a defining feature of the housing market, with high house prices relative to incomes preventing many households from accessing home ownership. This is particularly acute in London, where affordability ratios significantly exceed national averages. Later household formation, coupled with hybrid working patterns, has created a demographic whose housing needs are evolving toward more space, flexibility, and stability, yet who are increasingly unable to buy a property of their own. SFH BtR fills a structural gap, enabling households to access family-sized homes and the benefits of suburban living, without the financial barriers of purchasing.

A national boom, but a London absence

The British Property Federation reported that BtR was increasingly present in the development pipelines of 213 Local Authorities in Q3 of 2025, with SFH considered largely responsible for driving this increase because of an increasing number of suburban schemes coming forward.

Growth patterns are far from uniform across the country, and London is a stark outlier. While the regions benefit from increased SFH delivery, the capital sees almost none. A review of the websites of major SFH BtR developers and operators, including: Simple Life, Leaf Living, Grainger PLC, and Lloyds Living, reveals no clear examples of SFH schemes in London itself. This absence is unsurprising given the structural conditions which shape the capital's housing market. A fundamental tension exists between London's planning and land-use policies, the economic realities of land values and construction costs, and the rising national demand for SFH.

Currently, planning policy (both adopted and emerging) prioritises high density development in urban areas. This aligns with London's overarching strategic planning policy objectives which seek to maximise land efficiency, increase housing delivery and support sustainable urban development. Yet inherently SFH delivers lower densities, making land use less efficient in planning terms and often rendered unviable by high land values. The issue of via-

bility is compounded by the fact that SFH schemes are subject to the same affordable housing requirements as other residential developments. For suburban or regional SFH schemes, viability can often absorb these contributions. In London, however, where both land and build costs are notoriously higher, imposing conventional affordable housing obligations can undermine the financial feasibility of SFH.

Can planning policy make room for family-sized rental homes?

These conflicts raise important questions about the role SFH could or should play within London's housing mix. If London is to accommodate SFH BtR policy may need to evolve. One option could involve allowing flexible densities in specific areas where there is demonstrable demand and land capacity.

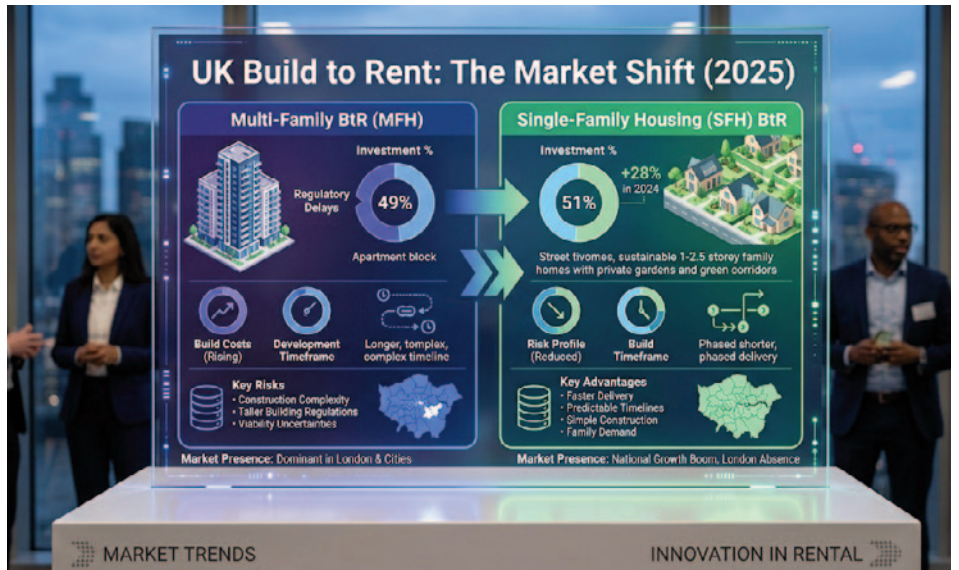
Another possibility is reviewing whether SFH should be subject to different affordable housing requirements, recognising that SFH as an asset class provides access to family homes for households who cannot afford to buy.

This could be formalised through the creation of a bespoke planning use class for BtR (or SFH specifically), with tailored planning and viability frameworks that reflect its unique market function and social value.

Alternatively, schemes could capitulate on those elements which make SFH successful, e.g. flexible internal space and increased private amenity space, but deliver these features within lower rise apartment blocks, creating a hybrid model that balances the strengths of both SFH and MFH. This is already seen in some examples of SFH in regional urban areas such as CASA by Moda's Vista Park, which is located 15-minutes from Glasgow City Centre and includes 156 new family homes across 1-2-bed apartments and 2-4-bedroom houses.

There is a clear momentum behind SFH BtR signalling an ongoing change in how households want to live and how investors are choosing to deploy capital. As demand continues to shift towards increased space, privacy and flexibility, SFH is increasingly positioned to become a defining component of the UK's rental landscape. Yet, London's absence from this growth highlights how planning constraints, land values and policy frameworks can restrict the delivery of alternative housing products. A hybrid lower-rise model may offer a compromise, but its success will be dependent on robust viability and a more flexible planning approach - one that recognises SFH as an essential asset class capable of providing family homes at a time when ownership is increasingly out of reach. ■

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Support local councils for growth

Changes to the planning system are welcome but under-resourced local authorities may struggle to comply, says Riette Oosthuizen

Inefficiency in the planning system has become a popular scapegoat for the current standstill in housing development. The cost of land, the economic downturn, sky-high construction costs and limited absorption rates for new homes have also contributed, resulting in an 84 per cent drop in construction starts over the past decade, as Melior reported last month.

Will changes to the planning system address some of this gloomy picture, even if only in part? A system that fosters uncertainty is never helpful, nor is one that is weighed down by technical requirements unrelated to encouraging good-quality growth in the most appropriate places.

In its purest form, the planning system exists to protect land and environmental assets as finite resources and to safeguard the public interest. Originating in Victorian public health concerns, it has evolved into a complex legal framework that balances economic growth, social equity and environmental protection through a discretionary, plan-led system.

In recent years, however, the visibility of these core principles has become somewhat lost in the frenzy of what is considered 'viable', leading to outcomes based on what can be built rather than what should be built to meet need.

The latest National Planning Policy Framework (NPPF) consultation introduces some of the most direct changes in years, representing a fundamental overhaul of previous versions. It incorporates the National Development Management Policies from the Planning and Infrastructure Act 2025, assuming their inclusion in the NPPF gives them clearer weight.

New regional development strategies will set a defined spatial framework for investment and housing growth, and both these strategies and local plans are expected to avoid duplicating national decision-making principles.

I would like to focus on one particular implication: how local plans can be shaped using these national principles while still applying a distinct, site-specific spatial emphasis.

Local plans will need to show how they will encourage housing and economic growth, prioritising transport nodes where densities – depending on

the size of the hub – should be at a minimum of 40 to 50 dwellings per hectare. Growth across the local authority area should be divided into large site allocations (including town centres and the grey belt), a new category of medium-sized sites (10 to 49 homes and up to 2.5ha) and small sites.

Small sites now include 'infill within residential curtilages', implying that back gardens and green belt may be considered suitable for development. The medium-sized category has been introduced specifically to support small and medium-sized builders, with proposed measures around biodiversity net gain exemptions and offsite cash contributions for affordable housing.

Under-resourced local authorities

Local development orders (LDOs), masterplans and design codes should be used proactively by local authorities to guide and encourage housing and economic growth. This implies a much more spatially driven approach, with local authorities needing to set out early where growth should happen and what it should look like.

But how prepared are local authorities to take on this proactive growth support role? Many are already severely under-resourced, yet the expectations placed on them continue to grow. Proactively identifying growth areas, producing robust design codes and preparing LOs all require creativity, technical expertise and time - none of which come

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cheaply. Although new bespoke planning fees now allow authorities to determine fees for applications and pre-application engagement, early signs suggest this may be the main way to fund the new system, which could have alarming effects.

Delivering this new spatial agenda will also depend on strong, collaborative partnerships with the private sector.

Given current funding and staffing pressures, it is difficult to see how local authorities can meet expectations without such support.

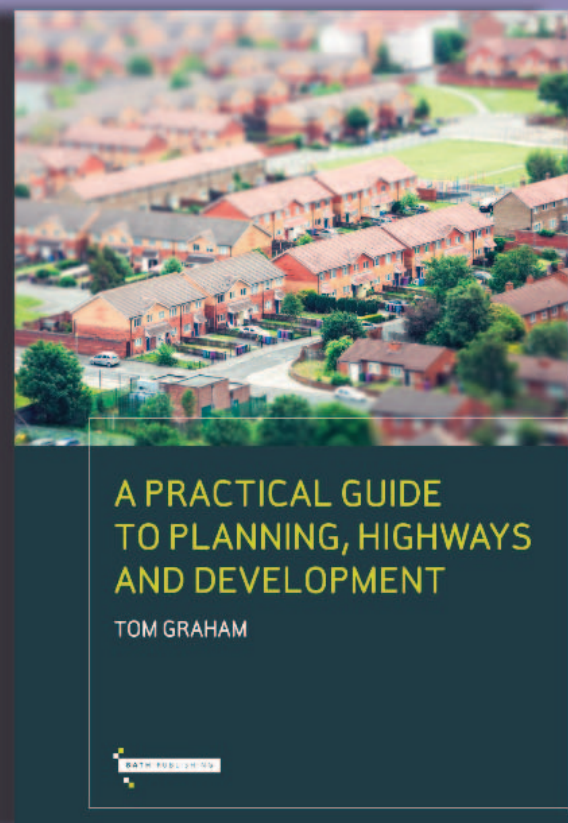
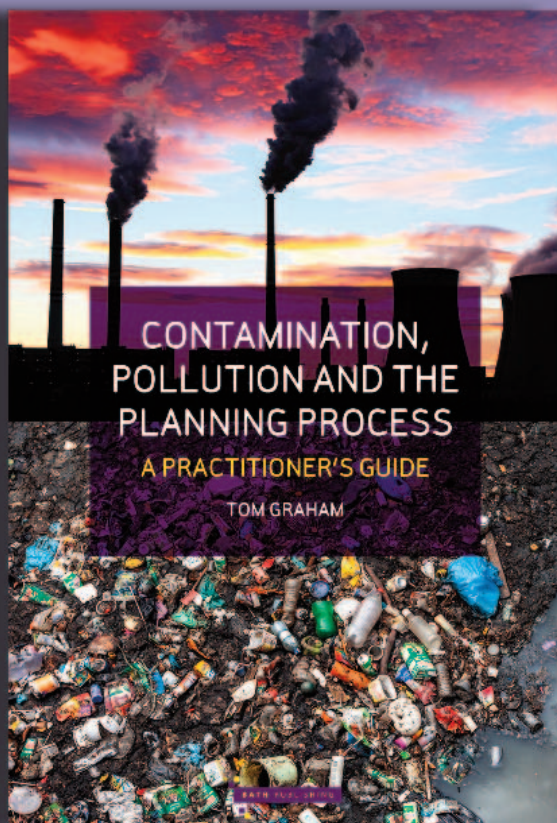
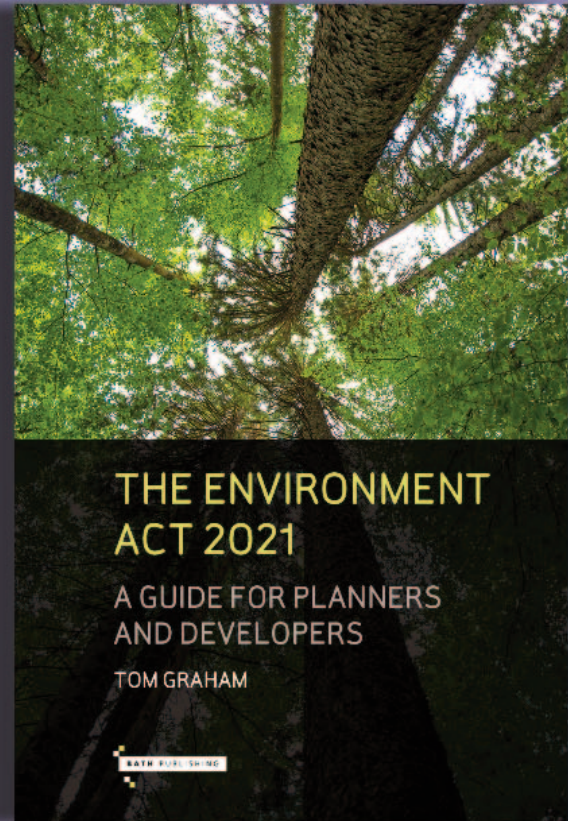
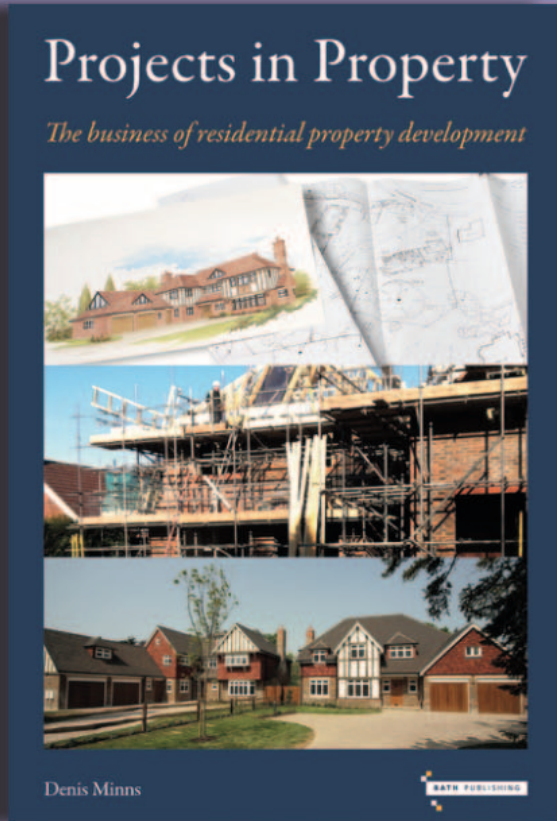
The prospect of a more positive, proactive planning system is exciting. But if it is to succeed – and if it is truly to drive housing development – local authorities must be given the resources to lead with confidence. Without meaningful investment, the ambition risks outpacing the capacity needed to deliver it. ■

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Housebuilding: the goose that lays the golden egg is dead

Politics is always a matter of trade offs. For 30 years this one has been quietly avoided. It cannot be avoided any longer, says Hugo Owen

Let's start with a short analogy. Picture a small manufacturer beginning the week. They make a respectable product, price it with care and hope that, if the stars align, next year might allow a new machine or two.

Now imagine informing this same firm that, from tomorrow, anywhere between 35 and 50% of its output must be handed over at cost or less. Its designs will no longer follow customer demand but the preferences of a committee with no intention of ever buying the product.

A slice of its revenue will be siphoned into public good initiatives entirely unrelated to the business. And if, despite all of that, it still turns a profit while carrying every ounce of risk, a clawback will be on hand to sweep up whatever margin remains.

No credible observer would expect this arrangement to survive in any other sector. Yet this is the framework in which we expect homes to be built and, more strikingly, it enjoys near universal political approval.

To understand how we arrived here, you have to go back to 1991. Before then, the state still accepted that infrastructure and affordable housing were public responsibilities, funded through taxation and delivered accordingly.

What had previously been financed collectively through the state was now attached to individual planning consents

The Planning Compensation Act 1991 changed that foundation completely. By creating the modern section 106 regime, it redefined the relationship between development and public goods.

What had previously been financed collectively through the state was now attached to individual planning consents. It wasn't just a tweak. It was a transformation in the economic model of an entire industry.

Once that shift had occurred, everything else followed its logic. Contributions originally conceived as limited and site specific hardened into expectations that every scheme would part-fund the social infrastructure once paid for by government or councils. And, because this was now the foundation, subsequent legislation simply added more weight to the same mechanism.

The 2008 Planning Act and the community infrastructure levy did exactly that. Rather than replace section 106, it sat on top of it. Two systems now pursued the same pot of value and the commercial space for delivery narrowed again.

By 2013, the Growth and Infrastructure Act introduced viability testing, an implicit admission that the cumulative burden had begun to undermine the very schemes meant to carry it. Yet instead of rethinking the model, the state kept adding to it.

The question now is not whether another public obligation will be attached to development but

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which one

The 2021 Environment Act and the 2023 Levelling Up and Regeneration Act brought biodiversity costs, net zero-aligned requirements and the proposed infrastructure levy. None of the earlier obligations were retired. The camel was not only handed another straw. It was expected to walk faster.

And, because each layer has normalised the next, the question now is not whether another public obligation will be attached to development but which one. Support for the triple lock perhaps? A cushion for frozen council tax? Or whatever fiscal gap emerges in the red book this autumn – said with tongue firmly in cheek, yes, but it illustrates a serious point: The logic of the system has expanded far beyond anything its architects ever intended.

Apply any of this to a normal manufacturer and the business would collapse before the model reached the boardroom. Yet housebuilding is expected to carry these demands indefinitely and still produce the homes the country insists it needs.

The contradiction is now visible in stalled sites, shrinking output and an industry that looks less like a golden goose and more like a bird that has been plucked past the point of survival.

If the government is serious about reversing that decline, it must start by recognising the scale of the shift that took place in 1991 and everything that has been piled on since.

Politics is always a matter of trade offs. For 30 years, this one has been quietly avoided. It cannot be avoided any longer. ■

Hugo Owen is policy lead at Pocket Living, a London affordable housing developer. He is also a writer and commentator on housing matters.

First featured in Prop Views



A Pocket Living development: West Green Place in Haringey

Don't be an April Fool: written reps planning appeals have got faster but also riskier

Expanding the expedited written representations appeal procedure to a broader range of appeals, larger developments will also benefit quicker decisions, says Simon Ricketts

You need to know how the rules changed on the first of April 2026 for 94.7% of planning appeals: those that proceed by way of written representations. There are traps for the unwary: whether for appellant, local planning authority or third party.

The changes have been on the cards since last June – see my 28 June 2025 blog post *How Do You Solve A Problem Like...Speeding Up Planning Appeals Without Being Unfair Or Counter Productive?*

On 12 February 2026 the Planning Inspectorate published *Planning appeals: procedural guide*. For appeals relating to applications dated on or after 1 April 2026 alongside the *Town and Country Planning (Appeals) (Written Representations Procedure) (England) (Amendment and Saving Provision) Regulations 2026* which were laid before Parliament that day.

The main difference is that the “expedited” or “part 1” written representations procedure, which currently applies in relation to householder and minor commercial appeals, will be extended to most appeals to be determined by way of written representations.

Under the procedure, the appellant is not able to submit evidence at appeal not previously considered by the LPA when they determined the application, leaving the appeal to be determined by the inspector solely by reference to:

- the application that the LPA determined (including all supporting evidence, plans and interested party comments)
- the LPA’s decision notice (including their reasons for refusal where applicable)
- The LPA’s committee minutes and planning officer report
- The appeal form
- The LPA’s appeal questionnaire

Third parties are not able to make further representations at the appeal stage so will have to rely on

the inspector taking into account any representations that were made during the course of the application.

As is already the case with all written representations appeals (part 1 or part 2), if a section 106 agreement or unilateral undertaking is required, the completed (i.e. executed and dated) version needs to be submitted at the time the appeal is submitted. This part 1 procedure will apply to the following types of appeal:

- Appeals against a refusal of planning permission
- Appeals against a grant of planning permission subject to conditions that the applicant objects to
- Appeals against a refusal of prior approval
- Appeals against a refusal of advertisement consent
- Appeals against the refusal of an application to approve a reserved matter
- Appeals against the LPA’s refusal of an application to modify or remove a condition under section 73 of the Town and Country Planning Act 1990
- Appeals against the LPA’s refusal of an application for planning permission for development already carried out under section 73A of the Town and Country Planning Act 1990
- Appeals against permission in principle or refusal of technical details consent

It is open to the Planning Inspectorate to decide that that an appeal which is eligible to follow the part 1 procedure should instead follow a different procedure. For example the guidance says that “appeals against an LPA’s refusal of a biodiversity gain plan, whilst eligible to proceed under part 1, will usually follow the part 2 procedure”.

This leaves only the following types of written representations appeal as still following the existing part 2 procedure:

- Appeals against the LPA’s failure to determine an application within their time limit for doing so

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(‘non-determination’ cases)

- Appeals in relation to an application for Listed Building Consent

- Appeals in relation to a discontinuance notice

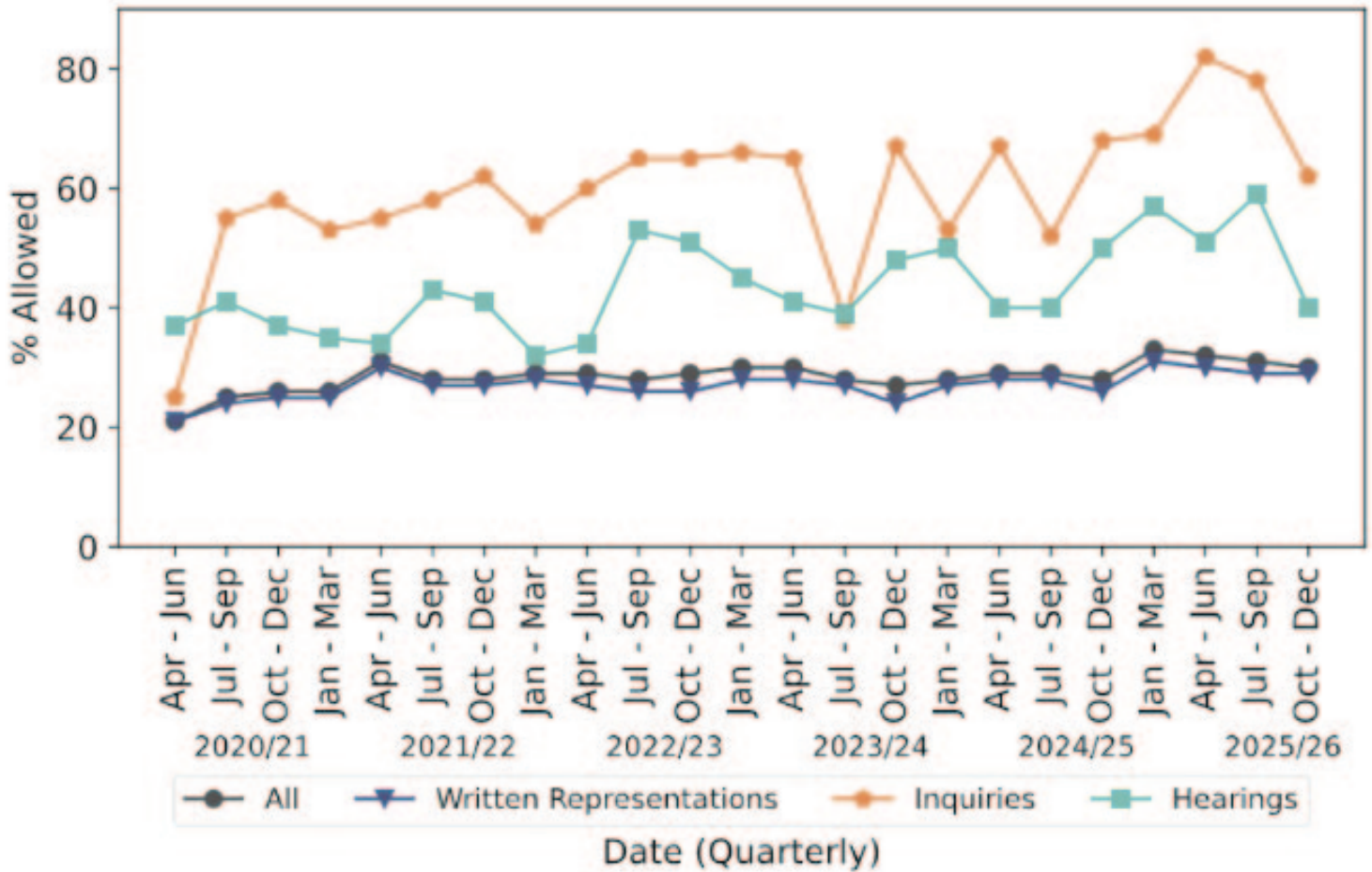
Why the changes? The most useful, detailed, justification for the changes is set out in the explanatory memorandum to the Regulations. It states that as at March 2025, appeals following the part 2 procedure took an average of 29 weeks whereas appeals following the part 1 procedure took an average of 18 weeks. (In fact the Planning Inspectorate’s December 2025 figures show improvements on these timescales, the averages now being 21 and 14 weeks respectively – with hearings taking an average of 25 weeks and inquiries an average of 38 weeks).

The memorandum says this:

“The number of appeals decided through both written representations procedures will remain the same. Expanding the expedited procedure will allow more appeals to be decided more quickly. It will reduce pressure on local planning authorities by removing the need for them to submit a full statement of case, although they will need to ensure that the decision notice or officer’s report is sufficiently detailed.

Additionally, with no further opportunity to comment, it removes the need to process and publish representations from interested parties. It will reduce the burden on appellants by reducing the amount of documentation needed when submitting

Figure 2. s78 planning appeal success rates by procedure type



an appeal. It will reduce the burden on all parties by removing the opportunity for any comments at the appeal stage. By expanding the expedited written representations appeal procedure to a broader range of appeals, larger developments will also benefit from the streamlined process and quicker decisions, helping to unlock economic growth and accelerate the delivery of homes."

Taking this at face value, obviously quicker decision times are in everyone's interests.

However, certainly there are concerns:

- Whilst it is said that the number of appeals decided by way of written representations will remain the same, is this the slippery slope and will we see over time a greater overall proportion of appeals going by this route, including a greater proportion where the complexity of issues and level of potential third party interest makes the process appear like an inappropriately summary form of justice?

- What happens in the frequent case where the appellant requests a hearing or inquiry route but is pushed down the written representations route by the Planning Inspectorate (given that the criteria for which appeals are appropriate for written representations, hearings and inquiries are not objective but rely on the application of judgment in

each particular case)? The procedural switch is already problematic but will get more difficult.

- What about where members refuse an application against officers' advice? Perhaps helpfully for appellants, in practice the basis for the members' decision will have to rest on the minutes of the committee meeting. In practice will this mean a greater number of deferrals so that credible potential reasons for refusal can be prepared?

- Do the changes favour well-advised potential appellants? The strategy is now clear: the applicant needs to make sure that their application package is robust and appeal-ready, that they have responded to issues raised by third parties and they have resolved or narrowed down any potential difference in relation to any necessary section 106 agreement or undertaking – and to have made good progress on a draft.

Lastly, perhaps a few words on the statistics as to which procedure is most likely to result in an appeal being allowed. Appeal Finder have done some good statistical analysis.

Whilst this shows that by comparison of appeal route, inquiries are most likely to succeed, followed by hearings – and with the written representations procedure being least fruitful for appellants, I am always cautious as to the conclusions to be drawn. It

is tempting to think that the obvious strategy is to seek an inquiry and, failing that, a hearing – and lawyers like me will usually trot out the benefits of cross-examination and formal exchange of evidence (inquiries), the greater likelihood of a senior inspector being appointed and at the very least the opportunity to tell from the inspector's body language and line of questioning whether he or she has understood the particular issues.

Much of this is true. But to what extent are the statistical differences simply correlation rather than causation?

Surely the larger the scheme the better professional advice the applicant is likely to have had and the less likely the applicant is to contemplate taking to appeal a proposal that is doomed to fail?

I wonder if there is any housebuilder that has collected statistics on their own projects as to whether there is a material difference in outcomes for projects with an equivalent project team involved?

In the meantime, if you have a potential appeal on the stocks which may go by way of the written representations route, don't get caught out now April is here!

From Simon's Simonicity blog which represents his personal views only. ■

Gateway 3: the beginning of the end – or the end of the beginning?

There is no silver bullet. As experience builds, the process should improve. For now, the best defence is early planning, clear risk allocation and relentless documentation, says Vijay Bange

Imagine the scenario. You're a developer delivering high-rise homes into a market crying out for them. You've navigated planning, balanced stakeholder concerns with viability, secured funding, and paid heavily to satisfy the Building Safety Regulator (BSR) so you can clear Gateway 2 and draw down funds. You've agreed a contract sum—painful but necessary. Then Gateway 3 arrives, approvals stall, and the finish line becomes another starting gun.

The vignette is simplified, but the tension is real. Projects that should be moving into occupation are stuck because Gateway 3 is slower and less predictable than intended. That is not a mere inconvenience; it threatens delivery, cash flow, and confidence in a regime that promised clarity after the tragedies that shaped it. While attention has focused on Gateway 2 delays, the more immediate reality is that the bottleneck is shifting downstream.

Gateway 3's statutory review period is eight weeks. Yet our recent FOI request shows that of 158 applications submitted last year, more than a third took over three months to determine, with dozens still undecided beyond that point and one case extending well over a year. For schemes with debt service, committed sales, phased handovers or tight longstop dates, that uncertainty is corrosive. It undermines programming, invites claims, and forces decisions at the least forgiving point in a project's lifecycle.

So how is that risk mitigated? Much of the BSR's commentary on Gateway 2 delays has focused on submissions lacking detail. At the same time, it has

not always been clear what "good" looks like. A defining feature of the new regime is that the burden sits with applicants to demonstrate compliance; the regulator will not do the job for them. That ambiguity extends into Gateway 3, where guidance on contractual risk allocation remains limited.

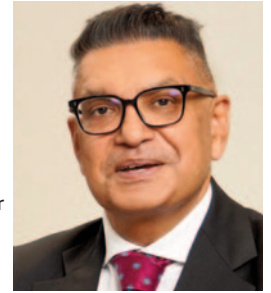
Those expecting the JCT 2024 suite to offer a ready-made solution for higher-risk buildings will be disappointed. The position is explicit: parties must agree their own approach. NEC is similarly pragmatic - deal with the risk in the Scope. Clarity cannot be outsourced; it must be drafted.

On paper, Gateway 3 is straightforward: evidence that the works comply with building regulations, supported by declarations from the principal contractor and principal designer. The submission should include as-built drawings, a complete change record since Gateway 2, and a coherent golden thread enabling the accountable person to manage safety risks over the building's life.

In reality, Gateway 3 is not a bundle assembled at the end. It is the culmination of hundreds of coordinated, validated decisions made and recorded throughout delivery.

Timing is the critical trap. If Gateway 3 has not been planned for before works commence, teams are already on the back foot. Poor change control and late notification of material design changes almost always surface at the worst possible moment, triggering BSR queries and prolonging determination.

Data discipline is equally important. You cannot conjure a golden thread at practical completion; it



Vijay Bange is Head of Construction and partner at Irwin Mitchell

must be built from day one. Responsibilities, formats and validation rules need to be agreed early and enforced across the supply chain. A common data environment, revision control and an auditable link between changes, instructions and the record model are now essential.

Contractual mechanics must also be addressed explicitly. Unlike Gateway 2, Gateway 3 risk sits within live contracts. Under JCT, whether BSR-driven delay is neutral or gives rise to limited cost recovery is a matter for negotiation. Employers must also recognise their own statutory duties; creating impediments can quickly open the door to claims. Under NEC, precision in the Scope is critical, with Gateway artefacts, information ownership and response times clearly defined and aligned with compensation events.

There is no silver bullet. As experience builds, the process should improve. For now, the best defence is early planning, clear risk allocation and relentless documentation.

Gateway 3 is the decisive checkpoint where projects must prove, not merely claim, compliance with building regulations. Success depends on contemporaneous evidence gathered throughout construction, not retrospective reconstruction at handover. The golden thread must be maintained in real time, with controlled change, clear accountability and collaboration with the Registered Building Inspector. Ultimately,

Gateway 3 is about defensible reality: if you can't evidence it, it didn't happen. Gateway 3 is meant to be the moment confidence replaces uncertainty. Today, it remains a hurdle many are clearing more slowly than expected. Whether it marks the beginning of the end—or merely the end of the beginning—will depend on how quickly these disciplines become business as usual. ■

What does good practice look like?

- Plan for Gateway 3 at RIBA Stages 3–4, with a mapped evidential pack and programme float.
- Run a mock Gateway 3 ahead of submission to test completeness and traceability.
- Appoint an information manager with authority to enforce standards.
- Codify change control so material changes automatically update the golden thread.
- Draft contracts for the risk you actually have, not the one you hope for.
- Engage early with the BSR on material issues.
- Ensure the principal designer and contractor are properly resourced for declarations.

Housing as infrastructure

Affordable housing has to be part of the core investment that allows the capital's economy to function well, now and in the decades ahead, says Jordan Davies

London residents and professionals are victims of a housing crisis more intense than in any other city in the UK. Rents consume salaries, overcrowding is normalised, and many families live in insecure accommodation. More than 100,000 children are now in temporary accommodation, a number that is shocking in a national context, let alone in a single city.

This is both a social and an economic emergency: a city cannot function well when much of its workforce, including key workers, live in insecure or unsuitable accommodation. If London is to sustain its role as the UK's economic engine, good quality affordable housing needs to be regarded as core infrastructure, alongside transport, schools and utilities.

Why 'Genuinely Affordable homes' are different

Not all affordable homes provide strong and secure foundations for a stable economy. Genuinely affordable homes let at Social Rent or London Affordable Rent levels are more beneficial than other forms of subsidised housing as they are explicitly tied to local incomes, rather than set at a discount of market values. As such, they are designed to be genuinely affordable for people on low and modest wages.

These homes also provide security of tenure and therefore stability. It allows families to put down roots, plan their lives and invest in their local area. That stability supports steady employment and reduces the churn that undermines educations, GP practices and local businesses. By contrast, the current system relies heavily on subsidising private rents through benefits, incurring significant costs without providing secure family homes. Housing security and affordability go hand in hand, otherwise the cost to the taxpayer increases in line with private rents without bringing the social and economic benefits of secure accommodation. This is however what genuinely affordable housing offers, underpinning its value.

Genuinely affordable housing also reduces reliance on the most volatile parts of the private rented sector. When households are able to move from precarious, expensive rented accommodation into well managed and secure social homes, they gain both disposable income and peace of mind. The money that is no longer swallowed by rent is spent in

local shops, on transport and on services an indirect boost to London's local economies. At the same time, the overall cost to the taxpayer is reduced, since fewer households require subsidies to cover high, and ever increasing, private rents.

Public services need stable homes

The link between housing and public health is now well documented. Overcrowded, damp or insecure homes contribute to physical and mental ill health. That feeds through into higher costs for the NHS and social care, as well as higher levels of sickness absence for employers.

Conversely, access to good quality, secure affordable housing supports healthier lives. It reduces stress, improves educational outcomes and allows older residents to remain independent for longer. From an economic perspective this means fewer avoidable hospital admissions, better school attendance and attainment and a more productive workforce. When we look at housing in this way, it becomes clear that good quality secure affordable homes are part of the city's social infrastructure in the same way that public transport, GP surgeries and schools are. The difference is that affordable housing is not funded or planned with that status in mind.

Housing as infrastructure, not a revenue cost

Recent research for Shelter and the National Housing Federation estimated that building 90,000 social homes a year would deliver a net benefit to the Treasury over 30 years. The research demonstrates that investment in social housing more than pays for itself when savings in housing benefit, health and temporary accommodation are taken into account, alongside higher tax receipts from a more secure, productive workforce.

Hence the growing call for housing to be treated as infrastructure within government spending frameworks. Energy, transport, water and waste projects are already recognised as nationally significant infrastructure, eligible for long term funding settlements and bespoke delivery mechanisms. Housing, by contrast, is still largely confined to shorter cycles and fragmented grant regimes. Investors and lenders increasingly view affordable housing as a long term, stable asset class. For them, reclassification would not be a radical shift so much as an alignment of



Jordan Davies, Boyer
(part of LRG)

public policy with market reality. It would enable more predictable pipelines of council and housing association schemes and give councils greater confidence to plan for the long term.

Putting the solution into practice

London already has an ambitious programme to increase the supply of genuinely affordable homes, supported by the Mayor and many boroughs. That progress is welcome, but the scale of the challenge suggests that delivery needs to move beyond individual funding rounds and one-off initiatives.

If we accept that genuinely affordable housing is essential to London's economic resilience, we should treat it in the same way as we treat investment in new rail lines or strategic energy projects. That means long term programmes, not sporadic grants; planning policies that give weight to genuinely affordable, secure homes in locations where they support labour markets and public transport, and better alignment between housing, health and employment strategies.

For practitioners in planning and development, there is an opportunity to make the economic case for social and council housing more clearly through local plans, infrastructure delivery strategies and individual schemes. It also challenges us to design and affordable homes that are well integrated with the wider city, so that they support mixed communities and strong local economies.

For London to remain a place where people on ordinary incomes can live, work and build a future, affordable housing cannot sit at the edge of the infrastructure conversation. It has to be part of the core investment that allows the capital's economy to function well, now and in the decades ahead. If this model is adopted, the benefits will extend far beyond individual households in London, but it will lift economic output across London and the UK. ■

Long term funding for new towns

Last year's budget missed an opportunity to unlock long term funding for new towns, says Francis Truss

In ignoring new towns in the Budget last November, the government has risked delaying or stymying their delivery. The government has nailed its colours to the mast with a pledge to deliver 1.5 million homes this Parliament and the Secretary of State for Housing, Steve Reed, has gone further by tying his reputation to that target. Yet only a fraction of those 1.5 million homes, if any, will be in a designated new town unless action starts now. New towns are, by definition, long term. But the Budget is not about what happens in the 2040s. It is about what happens this parliamentary term: it should have allocated initial funding and in doing so, instilled confidence and enabled the New Towns Taskforce to move from a shortlist of sites to real programmes that investors, landowners and local authorities can back.

Why upfront funding matters more than big numbers

The headline numbers are daunting. Analysis suggests that each new town will cost between £3.5 and £4 billion to deliver, or around £400,000 per home – far above the UK's average house price of £272,000 (UK House Price Index). And that's before we even factor in that 40 per cent of the new town homes are to be allocated as affordable housing.

The cost per home is due to the fact that infrastructure must arrive years ahead of receipts from homes and business rates. CIL funds will not cover the cost. Nor will house builders shoulder this funding risk, as their model is geared towards phased outlets and cyclical demand, not multi-decade infrastructure programmes. That is why the New Towns Taskforce has been explicit in calling for significant upfront government funding, including long term loans to development corporations and a clear priority for new town infrastructure across departmental spending. Without that early commitment, delivery stalls.

Learning from Milton Keynes

Post-war new towns were delivered because the state borrowed, assembled land at agricultural value and recycled the uplift to pay down the debt. In Milton Keynes, the development corpora-

tion's costs were eventually reimbursed to the Treasury through development receipts. It worked, but it took three decades, until 1997.

Recreating that model would mean this Parliament's new towns not being paid for until the 2060s. But today's fiscal politics are very different. The Chancellor's investment rule is that net financial debt should fall as a share of the economy by 2029/30. So the question is not whether the government writes a blank cheque for new towns – because it will not – but whether the Chancellor can allocate early investment credibly: loans, guarantees and tax-backed instruments tied to tangible assets and predictable revenue, rather than as simple grant.

Four decisions that cannot wait

First, the government should set out a specific loan and guarantee offer for new towns, routed through the National Housing Bank and Homes England. The Taskforce has pointed towards long term loans to development corporations. The Chancellor needs to confirm that principle, put an order of magnitude on the facility and state clearly that core new town infrastructure will be eligible. This does not need to cover the full cost of the twelve new towns at approximately £4 billion per town, but it must be large enough to signal intent – say £0.5 billion per town.

Second, we need clarity on whether land value will be captured and recycled. Post-war corporations bought low and sold high. That's unrealistic today given modern land values and case law. The Budget should've signalled a preferred mechanisms, whether that is a standardised multiplier to existing use values, CPO reforms or other approaches.

Third, the Chancellor should make a political commitment to delivery. The House of Lords Built Environment Committee has been clear that delivery requires a senior minister with cross-departmental responsibilities. The government has already promised a New Towns Unit. The Treasury must confirm its remit, its relationship with Homes England and whether development corporations will be the default delivery vehicle. Investors will take a different view of schemes that sit under a statutory corporation with clear powers and a long horizon.



Francis Truss, Partner,
Carter Jonas

Fourth, there must be a realistic line on affordable housing expectations. A 40% minimum, with half for social rent, seems idealistic. The recent publication of the government's Homes for London policy paper demonstrates that sometimes it is necessary to be flexible with such requirements if development is to proceed at all. The Chancellor should acknowledge the viability challenge and tie funding to flexible, evidence-based trajectories.

Making space for private capital

It goes without saying that the point of upfront public funding is to unlock far larger flows of private capital, not to replace them. Institutional investors like long duration assets, where income is stable inflation-linked assets. Crucially, investors need confidence that a primary school, a rail station or a spine road will arrive on time, that land assembly powers exist and that policy will not suddenly shift. The same applies to master developers. A long term master developer, backed by public partners, can offer serviced plots to house builders, taking on the early, expensive pieces of the jigsaw. But that model only works if those pieces have committed funding. So the Budget should have sent a signal that the government is prepared to share risk at the front end so that private capital can shoulder it thereafter.

A test of seriousness

The missed opportunity is the government showing how it can use its balance sheet for long-term housing delivery. The sums required now are modest compared with the long-term investment they unlock, whereas inaction means delayed new towns, mounting pressure on local authorities, higher housing benefit costs and lost growth. ■

Revised guidance on viability

Government's ability to influence delivery through viability policy is limited unless accompanied by more flexible, market-responsive planning and a stronger focus on land supply, argues Andrew Golland

The Government published draft guidance on viability in December. This appears in both the NPPF and the National Planning Practice Guidance (NPPG).

These key policies and practices are proposed:

- A reduction in unnecessary site-specific viability assessments (NPPF, DM5 'Development Viability'). Assessments will need to demonstrate clearly where site circumstances differ from the typologies tested at the Local Plan Examination in Public stage. In other words, stronger justification will be required to explain why a site or scheme is materially different and why Local Plan targets or policy objectives should not apply.
- This objective, linking viability back to the Plan, is reinforced through an additional paragraph (009) in the revised NPPG.
- Greater use of review mechanisms to "seek policy compliance" (DM5). The NPPG (010) makes clear that these mechanisms are intended to support local authorities, not to allow developers to avoid compliance.
- Annex B of the revised NPPF proposes moving the section on "Standardised Inputs to Viability Assessment" (currently in the NPPG) into the Framework, with the aim of reducing negotiation at the decision-making stage.
- More intensive scrutiny of the use of Section 106A and Section 73 provisions, which currently allow schemes to be reviewed in light of changing market conditions (DM5). The draft NPPF signals that local planning authorities should be more cautious about revisiting viability, while also noting that viability will be reviewed at a higher policy level.
- A limited extension of the principle of non-assessment on Green Belt sites where the Plan already contains evidenced policy (NPPG, 030).

What's New? In most respects, the direction of travel remains the same. Government wants Local Plan evidence to predominate and site-specific negotiations to be minimised. The logic is straightforward: if plans are more robust, development should proceed more quickly. However, making local plans sufficiently robust is a much greater challenge.

First, the resources required to prepare an evidence base capable of addressing most development

scenarios simply do not exist. Instead of a typical £30,000 viability study, a genuinely comprehensive study might cost ten times that amount.

Second, even with a larger budget, evidence can be diluted or undermined in the political process. Members may resist Affordable Housing targets, debate competing priorities for planning obligations, or even abandon or reverse Community Infrastructure Levy programmes because they dislike pooled or cross-district payments.

Third, increasing the detail of Local Plan evidence is arguably misguided. On larger sites especially, applicants will still fight hard for marginal reductions in obligations because even small changes significantly affect scheme profitability.

Fourth, this may be the wrong moment to tighten policy. The development industry faces flat gross development values alongside rising costs. Logically, this calls for greater flexibility and more reliance on localised, up-to-date data rather than rigid headline assumptions.

The approach to changing market conditions is also inconsistent. Review mechanisms are encouraged to unlock schemes, yet applications to vary agreements in response to market changes are discouraged. In reality, these tools are interlinked. Too often, Section 106 agreements are signed without review mechanisms and quickly followed by applications to vary once viability pressures emerge. The draft guidance does not fully recognise this relationship.

Finally, relocating the Standard Inputs from guidance into the Framework feels cosmetic — rather like rearranging deckchairs on the Titanic. It does little to improve the viability process. Moving a list of well-known variables from guidance to policy seems unnecessary and risks blurring the distinction between process and policy. It also raises the question of what might be moved next.

Opportunities Missed In many respects, the revised NPPF and NPPG read as though drafted in isolation from the real causes of delivery problems. The main constraint on delivery is not planning policy but the market. Government has limited influence over the fundamental relationship between values and costs. Gross development values are largely determined by the second-hand market, while costs are shaped by



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macro-economic factors such as materials prices and labour availability. These are structural forces beyond the reach of planning.

Where planning can make a difference is land supply. Increasing supply lowers land values and improves the potential to secure Section 106 contributions. Yet there is little evidence that the planning system is being used decisively to achieve this. Even major initiatives, such as proposals for new towns, now appear at risk of failing to deliver promised community benefits because of viability concerns.

What is needed instead is a more flexible planning system. Policy should respond quickly to changing market conditions. Small movements in values or costs can have large impacts on what can be delivered through Section 106. These changes can be modelled without relying on cumbersome review mechanisms. A small number of authorities have adopted more responsive approaches, but they remain the exception. There is also no reconsideration of the fundamental definition of viability, which still fails to balance appropriately developer and landowner returns. This imbalance varies significantly between housing types and can hold schemes back.

The guidance on Benchmark Land Value remains confused. The choice between Existing Use Value and Alternative Use Value is unclear, and there is still no firm guidance on what constitutes an appropriate "plus" element. Viability cannot be separated from landowner expectations, which in turn should be linked more directly to land supply in each district or borough. Ultimately, this represents a missed opportunity. Government's ability to influence delivery through viability policy is limited unless accompanied by more flexible, market-responsive planning and a stronger focus on land supply. Without that, ambitions for higher levels of development will remain difficult to achieve. ■

Exploring the barriers to density

The Building Safety Act is not the only barrier to building upwards. What needs to change to unlock delivery, asks Chris Hemmings

The word 'density' is increasingly used in the context of planning and development. In places with the greatest need for new homes, land is scarce, boundaries are tight and opportunities to expand outwards are limited. In those circumstances, building more homes almost inevitably means building more densely.

Unpacking the density gap

And yet the UK is failing to do so. Centre for Cities' report Flat Britain: The urban density gap and how to close it shows that if British cities were built at the density of their French or Japanese peers, they would contain at least 2.3 million additional homes across their urban cores. Furthermore, if the density of London's urban core (Zones 1 – 3) matched that of Paris, the capital would have at least 500,000 more homes. The problem is not limited to London: the report also states that the density gap is greatest in Britain's big cities outside of London – these 12 alone comprise over half of the total gap.

Recent data from the Greater London Authority shows that the number of flats and houses being built has declined in each of the past three years, from 38,987 in 2021-22 to 28,756 in 2024-25. In the first half of 2025, fewer than 2,200 homes began construction in London, according to data from Molior, compared with 8,500 in the first six months of 2022 and more than 13,500 in the first half of 2018.

Additionally, GLA data shows that London's housebuilding has fallen to its lowest level in more than a decade and cites the difficulty in getting official approval to build flats from the building safety regulator after the cladding crisis.

That logic for higher density is well understood by planners and policymakers: it is acknowledged that higher-density development supports sustainable transport, makes better use of existing infrastructure and helps to underpin town centres and local services. In theory, it is an efficient response to constrained urban conditions. In practice, delivering density has become increasingly difficult, due to market and regulatory factors.

Now more than ever, there is a substantial gap between the political ambition for density (which

will be fundamental to housing targets being met) and delivery on the ground. This is most evident in London, though the issues are increasingly apparent across other urban areas too.

New bottlenecks emerge

The Building Safety Act 2022 was introduced with the important objective of tightening the regime and restoring confidence in higher-risk buildings following the Grenfell Tower fire. Few in the industry would dispute the need for a stronger safety regime and more effective oversight. However, its implementation has brought with it approval bottlenecks with knock-on effects for how and where developers are prepared to build.

The requirement for Building Safety Regulator sign-off at Gateway 2, before works can begin on higher risk buildings, has introduced a new layer of uncertainty into development programmes. Target timescales are frequently exceeded, and in the absence of settled precedent, developers are often unable to predict how long approvals will take. For schemes that rely on height to achieve viability, this uncertainty quickly becomes a material risk.

Cost pressures mount

The problem is compounded by cost pressures. The requirement for second staircases in buildings over 18 metres reduces net internal area and efficiency. Furthermore, compliance costs add up across design, procurement and construction and taken together, these factors have encouraged a shift away from taller buildings towards mid-rise.

The forthcoming Building Safety Levy (proposed for October 2026) adds another layer to an already complex viability picture. Although the levy is modest when viewed in isolation, it does not operate in isolation – sitting alongside high affordable housing requirements, biodiversity net gain, energy performance standards and Community Infrastructure Levy (CIL) charges, all at a time when the Government's Help to Buy scheme was phased out and Registered Providers focused investment on their existing stock.

On marginal urban sites, where density is often the only route to making schemes stack up, these cumulative burdens matter. The levy is payable early in a scheme's life and in full, which has implications

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for cashflow as well as headline viability. For larger developers this may be absorbed, albeit reluctantly. For SME developers who lack the same economies of scale, the impact is proportionally greater.

Policy responses

Due to the rapid slowdown in completions in London as a result of recent regulatory changes and general market conditions, the GLA is consulting on changes to its affordable housing policies for a temporary short period to help stimulate the development market, most notably a reduction in the fast-track affordable housing planning route threshold from 35% to 20% on privately owned sites.

The Government is also consulting on providing CIL relief for residential schemes in London, also for a short-term period. Whether the short period of time for implementation makes a real difference to market activity, remains to be seen.

Moreover, these changes may call into question the introduction of the Building Safety Levy, or provide justification for greater relief for residential schemes where viability is already problematic.

Alongside safety and cost, potential leasehold reform adds another layer of uncertainty. The Government has stated its ambition to move towards commonhold for new flats and is currently consulting on a Draft Commonhold and Leasehold Reform Bill. However, the timing and practical transition could significantly impact development output.

Commonhold remains largely untested at scale in England and Wales. The majority of developers are cautious about being early adopters, lenders remain unconvinced about risk and security and buyers are wary of a step into the unknown.

The outlook

From my perspective, a balanced approach is

London co-living sector shows signs of maturity as applications accelerate

The London co-living sector has entered a more established phase, with a sharp increase in planning applications and greater consistency in how schemes are being brought forward, according to new analysis by Lichfields

The analysis, by national planning and development consultancy Lichfields, follows its November 2024 research and examines all major co-living planning applications submitted in London since mid-2024. It finds that 26 schemes, totalling more than 10,000 co-living homes, have been submitted, representing more than 40% of all co-living applications in the capital since 2018.

More than 75% of London boroughs have now seen at least one co-living application, up from around half in mid-2024. Average scheme size has increased from 295 units to 385, reflecting the submission of several large developments. Co-living is also being incorporated into major regeneration masterplans including Barking Riverside, Edgware Town Centre and Earl's Court.

Commenting on the analysis, Adam Donovan, Planning Director at Lichfields, said: "Over the past 18 months there has been a marked increase in the number of co-living applications, alongside greater consistency in how schemes are designed and assessed. Early schemes often raised fundamental questions about policy fit and acceptability. Now there is a greater understanding of the sector and more consistency in applications in terms of the form of development and approach to addressing policy.

This has reduced uncertainty and allowed decision-making to focus on quality, management and long-term operation."

Recent schemes also show greater alignment with London Plan Guidance. Average internal communal space per unit has reduced slightly, reflecting the adoption of the London Plan Guidance's tiered approach and a move away from rigid quantitative requirements towards qualitative design assessment.

Approaches to affordable housing vary across London. Of the schemes submitted since mid-2024 there is an even split between those providing on-site affordable housing in the form of conventional C3 homes or discount market rent and those providing a payment in lieu, although viability remains a key constraint.

Donovan said the inclusion of co-living within large regeneration masterplans was a further indicator of growing confidence in the sector. He added: "The fact that co-living is now being incorporated into major London masterplans alongside conventional housing points to a clearer understanding of the role it can play within mixed and balanced communities. While it remains a relatively small part of overall housing supply, it has established a more predictable footing within the planning system. ■

>>> essential. Reforming leasehold to address its shortcomings while building confidence in commonhold over time would allow the market to adjust. Moving too quickly risks undermining the apartment market on which higher-density delivery depends.

There are ways to reconcile density with safety and deliverability. Mid-rise buildings, typically between six and ten storeys, can achieve high densities without triggering the most onerous aspects of the higher-risk regime (although any residential scheme of 7 storeys or at least 18 metres high requires approval from the Building Safety Regulator). Mansion blocks and perimeter blocks deliver efficient layouts and good amenity while sitting comfortably within established urban fabric.

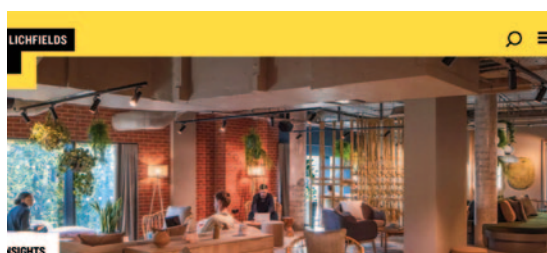
Construction methods also matter. Robust structural systems, simple geometries and repeatable design solutions are easier to verify and less prone to delay. Early engagement with the Regulator, particularly where modern methods of construction are proposed, can reduce risk later in the process.

Crucially, the regulatory system itself could evolve. A more proportionate approach for simpler or mid-rise schemes, clearer guidance on Gateway submissions and better integration between planning and building control would all improve predictability without compromising safety.

The need for density is not going away. If anything, it will intensify as housing targets remain under pressure and urban land becomes scarcer. The question is whether the current framework allows that density to be delivered at scale.

Safety must remain paramount. But safety delivered through uncertainty, delay and cumulative cost risks suppressing supply. A more calibrated approach, one that recognises different levels of risk, supports viable schemes and manages reform carefully, would help to close the growing gap between ambition and delivery.

If we want more homes in the places people need them most, we need to make building upwards possible again, not just in policy terms, but in practice. ■



A New Way to Live
Co-living in London