Citizens Advice response to the Draft London Plan Consultation 2026

citizens advice

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About Citizens Advice

We can all face problems that seem complicated or intimidating. At Citizens Advice we believe no one should have to face these problems without good quality, independent advice. We give people the knowledge and the confidence they need to find their way forward - whoever they are, and whatever their problem.

We provide support in approximately 2,500 locations across England and Wales with over 18,000 volunteers and 8,650 staff.

Through our advocacy work we aim to improve the policies and practices that affect people's lives. No one else sees so many people with so many different kinds of problems, and that gives us a unique insight into the challenges people are facing today.

As the statutory consumer watchdog for the energy and post industries we have an important role to play in shining a spotlight on the problems consumers encounter, providing solutions to these problems and ensuring their voices are heard when important decisions are made about the future of these essential markets.

Executive summary

Citizens Advice welcomes the opportunity to provide feedback on the Draft London Plan, and we broadly welcome the core themes of the plan. Addressing London's housing and affordability crisis while also meeting our climate commitments will require the right planning rules to expand the supply of affordable, safe, high-performing, and healthy housing. We particularly welcome the proposals to set strict energy efficiency targets for new homes, and measures which mandate a "passive" design approach to cooling. As energy costs continue to rise and extreme heat becomes a feature of London summers, measures like these will be essential to ensure London stays affordable and liveable.

As London navigates the energy transition and competing demands for space and grid capacity, the Mayor must guarantee that commercial decision-making does not push out social value. Prioritising consumer protections, low end-user costs, and community needs will be essential to shield low-income Londoners from financial hardship and extreme weather. Community access to affordable, good-quality housing and energy supply should be non-negotiable, even where this conflicts with developer commercial interests and requests for flexibility in agreements.

The context for Londoners

The Draft London Plan comes at a time of significant challenge for Londoners. Energy prices rose by 4% this October and are forecast to increase in January by £276 a year for the average household bill[1]. This follows an extended squeeze on finances since autumn 2021, with inflation and energy prices both remaining above pre-crisis levels for the last five years.

Citizens Advice debt data shows the lasting impact this pressure has had on households. Since 2019, the number of clients we see seeking help with energy debt each month has doubled, as has the average size of that debt, which is now over £2,000. Average total debt for our clients is now greater than £10,000[2].

London is particularly exposed because high living costs leave residents vulnerable to economic shocks. More than half (57%) of our debt clients in the capital are in a negative budget, meaning their essential outgoings exceed their income. This is the highest rate in the country. Londoners are also more likely than anywhere else in the country to live in the Private Rented Sector, a group that has been hit hardest by the energy crisis. Our debt clients in the PRS are the most likely to be in a negative budget[3], while people in the PRS are more likely to live in less energy-efficient homes and face higher rates of fuel poverty[4].

Extreme heat is a growing concern too, and energy affordability is no longer just a winter issue. Our recent polling shows that 8 in 10 (80%) of Londoners felt their homes were uncomfortably warm this summer, while nearly 4 in 10 (39%) are now as concerned about summer cooling costs as they are about winter heating bills, if not more[5]. Without ambitious measures to build heat ready homes, Londoners risk facing higher bills in both seasons.

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[1] Cornwall Insight, 16% Price Cap Rise Forecast in January, 2026

[2] Data from clients receiving specialist debt advice from Citizens Advice. You can explore this data on our data insights dashboard here.

[3] Someone is in a negative budget when their income is not enough to cover their essential costs, even after being helped by one of our advisers. You can find out more about our negative budget data here.

[4] Housing, Communities and Local Government Committee, Housing Conditions in the Private Rented Sector, 2026

[5] Figures from nationally representative survey conducted in 1-2 July 2026 by Yonder Data Solutions of 2,105 UK adults on behalf of Citizens Advice. For more information on extreme heating and home comfort you can read our research briefing here.

Energy prices are driven largely by global factors, so addressing this is beyond the Mayor's remit alone. We have called on the government to take further action, including reforming the Warm Home Discount, delivering the delayed Debt Relief Scheme, reducing policy levies on electricity bills and uprating the Local Housing Allowance[6]. But the GLA must use the levers it does have. In particular, the Plan must do everything it can to increase the supply of good-quality, efficient, affordable homes with access to low-cost low-carbon heat.

Summary of our response

We support the Mayor's primary aims of fixing London's housing crisis and delivering sustainable economic growth, while continuing to meet ambitious climate commitments. As the statutory advocate for energy consumers, our response focuses primarily on domestic energy and intersecting housing issues.

Housing supply and affordability

Citizens Advice data shows that unaffordable housing costs consistently drive financial hardship. High private rents frequently force our debt clients into negative budgets, where essential outgoings outstrip income, affecting 55% of the private renters we support[7]. While some factors lie beyond the Mayor's control, it is concerning that the plan's ten-year target for new homes falls short of the national target for London[8], and we urge the GLA to do everything possible to expand the supply of affordable housing[9].

Housing quality and energy efficiency

While increasing the supply of affordable housing is a key way to address people's living costs, it is essential that this housing is good quality. Poor energy efficiency and disrepair continue to damage private renters' health and finances[10]. In 2025, we helped nearly 50,000 people in England and Wales with poor-quality housing issues; a threefold

[6] Citizens Advice, Citizens Advice's submission to the 2026 Autumn Budget, 2026
[7] Citizens Advice, Citizens Advice Cost of Living Dashboard, 2026
[8] Greater london Authority, Heat Ready London: Adapting the city to a warmer climate, 2026
[9] We recognise that there are multiple specific definitions of social and affordable in planning and in grant funding programmes. Throughout this response we are using the time more broadly through the lens of affordability.
[10] Citizens Advice, Window of Opportunity: Delivering warmer homes to private renters, 2026

increase since 2018[11]. Additionally, 32% of surveyed private renters reported being unable to heat their homes comfortably, leaving millions facing a double burden of high rents and steep heating bills[12].

We strongly support new rules mandating landlords to upgrade properties to EPC C by 2030, though success requires effective local authority enforcement backed by GLA coordination. For new builds, we welcome the proposal to set strict absolute Energy Use Intensity (EUI) and Space Heating Demand (SHD) targets, and to remove the "carbon offset" loophole. With forecasts predicting a 16% energy price hike this January, building efficient homes is critical to lowering bills.

The importance of consumer protection

We must continue expanding access to affordable, low-carbon heating. While well-designed retrofit schemes are crucial for existing housing, new developments must adopt solutions that deliver the lowest end-user costs and best performance.

Crucially, heat appraisals must evaluate the consumer experience, including reliability and comfort, alongside cost and carbon performance. Heat networks are a significant part of the solution in London. But their installation prior to the introduction of consumer protections in January 2026, and in the absence of mandatory technical standards has led to poor outcomes for some residents[13]. For example, heat network consumers experience problems relating to the reliability of their supply, including being off supply or experiencing intermittent supply, 10 times the rate of people supplied by mains gas and electricity.[14] Installing inappropriate heating systems that create worse outcomes for consumers risks undermining the energy transition in the long run.

The ability for consumers to exercise their rights, while beyond the scope of the London Plan and the GLA, would be an important way to ensure that new and existing homes meet quality standards. The current housing redress landscape is deeply fragmented,

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[11] Issues include: Lack of suitable or affordable alternative accommodation, retaliatory evictions , Cladding issues, Disrepair/maintenance, damp/mould/condensation, fitness for human habitation, complaints, EPC rating issues, impact of housing on health. In 2025 we helped 49,385 people with an issue related to poor quality housing, compared to 17,762 in 2018

[12] Citizens Advice, Window of Opportunity: Delivering warmer homes to private renters, 2026

[13] Citizens Advice, System Critical: No margin for error in new heat network rules, July 2025; Citizens Advice, 3 ways the proposed heat network technical standards should help consumers, April 2026; Citizens Advice, Today is a major step forward for heat network customers - but the work doesn't stop here, January 2026.

[14] Citizens Advice, 3 ways the proposed heat network technical standards should help consumers, April 2026.

which makes it incredibly difficult for consumers to understand their rights or enforce them against developers and landlords who hold disproportionate power[15]. A statutory consumer advocate could act as the essential final pillar of the regulatory system, providing the independent advice residents need to navigate this complexity and confidently assert their rights without fear of retaliation[16].

Addressing extreme heat

Recent record-breaking summers have made extreme heat an urgent affordability and health crisis[17]. Nearly four in ten Londoners (39%) reported this summer that they are equally or more worried about summer cooling costs as winter heating costs[18]. Energy and built-environment policy must tackle this urgent problem directly. It is essential that the Mayor's office continues to work with partners through Heat Ready London, and that this aligns with the London Plan.

We fully support the mandate for "passive" cooling design, as active systems like air conditioning inflate bills and exacerbate the Urban Heat Island effect. Scrutiny should be applied to ensure developers have given due regard to these measures before plans are approved.

Because the Plan only covers new developments, a clear strategy is needed for the huge number of Londoners - disproportionately on low incomes - who live in existing, poorly ventilated housing that traps heat. The Mayor's Heat Ready London strategy notes that retrofitting these homes could require an upfront investment of £9 billion to £45 billion.[19] In the absence of this funding, the Mayor must adopt an approach that prioritises low-income households and those at greatest risk from extreme heat, including through London's delivery of expected future funding from the Warm Homes Plan.

London's relatively high proportion of heat network consumers also creates specific risks of overheating. Residents living in buildings with older, gas-run heat networks can be particularly vulnerable, as inefficient pipework can leak heat and raise indoor temperatures even when heating is not required. Our research found that around 90,000 heat network consumers are unable to switch off their central heating during the

[15]Citizens Advice, Citizens Advice response to The Single Construction Regulator Prospectus, 2026
[16] Citizens Advice, Building Better Markets: The case for expanding Citizens Advice's statutory advocacy and rights based advice model, 2026
[17] Met Office, Summer 2026 provisionally hottest on record for the UK, 2026
[18]Greater london Authority, Heat Ready London: Adapting the city to a warmer climate, 2026
[19]Greater london Authority, Heat Ready London: Adapting the city to a warmer climate, 2026

summer[20]. Sufficient funding should therefore be allocated to upgrading existing networks, improving their efficiency and improving comfort for residents.

Data centres

If managed poorly, the rapid expansion of data centres could undermine the core aims of the London Plan. In West London, data centres have already temporarily stalled housing developments since 2022 due to grid constraints[21]. They also consume significant water resources, have the potential to worsen air pollution, and could generate excess local heat which drives up the Urban Heat Island effect in neighbourhoods[22].

We welcome the dedicated planning framework for data centres, which requires authorities to assess resource capacity, local housing needs, and heat recovery. We would recommend that any planning framework aligns with other energy system planning and management, such as Regional Energy Strategic Plans (RESPs), and grid connections reform. However, transparent communication and careful consultation with residents will be essential to address these very real local concerns.

Below are our thoughts on specific policies in the Plan. From 2026 Citizens Advice expanded our energy team to respond to devolution and increased region-specific energy policy issues. Our response is part of this broader engagement, and we look forward to working with local stakeholders in London to improve outcomes for energy consumers in London.

Comments on specific policies

MBUL1: Spatial Strategy

We support the requirement for Local Plans to secure utilities capacity, implement energy efficiency measures, and connect to new heat network zones.

[20] Citizens Advice, Research Briefing: Experiences of Overheating and Home Comfort, 2026
[21] Greater London Authority, Data Centres delay housing delivery, 2025
[22] Marinoni et al, The data heat island effect: quantifying the impact of AI data centers in a warming world

MBUL3: Tall Buildings

We agree that development proposals for tall buildings should avoid causing significant detrimental effects on the solar energy generation of adjoining buildings. National policies, including the Warm Homes Plan and the Future Homes Standard, aim to significantly increase domestic solar[23]. It is critical that new developments in London do not undermine this potential in existing or new-build properties.

MBUL4: Utilities - capacity, connectivity, and resilience

We support the core intent of this policy to ensure developers consider utility capacity early and align with infrastructure upgrades. This could help ensure new developments do not negatively impact utility reliability for existing or new residents. Requirements for developers to consider microgeneration and demand management solutions could help reduce peak demand and network buildout, while waste heat considerations could support the expansion of low-carbon heat networks.

We also support requiring developers to engage with a range of information and strategies, including Local Area Energy Plans (LAEPs) where they exist, and Regional Energy Strategic Plans (RESPs). However, the GLA will likely need to provide further guidance on how these strategies should tangibly inform development applications, to ensure engagement is meaningful.

While we support the core intent of MBUL4, all steps must be taken to ensure much-needed housing developments are not unduly stalled. Also, where utility constraints must be mitigated by measures like microgeneration or storage, the GLA should prevent developers from using viability assessments to reduce the number of affordable or social homes they deliver.

MBUL6: High quality design

We strongly support explicitly requiring developments to consider climate resilience and use high-quality materials. The requirement to incorporate high-quality external shading to prevent solar gain is particularly important for passive cooling during intense heatwaves. We support independent design reviews for referable applications, but robust measures must also ensure quality standards for non-referable applications. All

[23] Department for Energy Security & Net Zero, Warm Homes Plan, 2026, Department for Energy Security & Net Zero, Rooftop solar for new builds to save people money, 2025.

possible steps should be in place to ensure that the quality of strategies in planning applications are carried through to the final development.

As above, safeguards should prevent developers from using viability assessments to reduce affordable or social housing. Requirements to "respond to local distinctiveness" should not act as a barrier to urgent social housing needs.

MBUL7 London's heritage

It is positive that the Plan explicitly supports energy efficiency and renewable improvements in heritage assets where an appropriate balance is achieved with conservation. Tenants and homeowners in conservation areas and listed buildings face significant upgrade barriers. While in practice many of these barriers will remain, giving decision-makers greater latitude to support interventions is especially important for fuel-poor tenants in heritage buildings.

In practice, installing energy efficiency or renewable energy measures while respecting heritage value, requires sensitive and sometimes bespoke approaches. Where this incurs additional cost, there is a risk that those costs could be passed onto leaseholders or tenants. This should be considered when assessing planning applications.

HN3 Delivering affordable housing

The plan sets a target of 558,000 new homes across ten years, falling short of the 850,000 the government estimates is required[24]. We understand the Mayor considers the government's estimate unachievable under current investment assumptions. However, a plan falling a third short of need will keep London rents high. From an energy affordability perspective, the energy-efficiency of a new home matters little if a chronic lack of supply makes rents too expensive for average Londoners.

The Mayor should take all necessary steps to ensure enough new homes are built, and crucially, that they meet all targets for social and affordable housing. This includes preventing developers from using viability assessments to reduce affordable housing delivery.

[24]Greater London Authority, London Assembly: New London Plan, 2026

HN8: Housing design

The plan currently states developments should "maximise" the provision of dual-aspect dwellings, rather than fully mandating them. Given the vital cooling benefits of cross-ventilation, this is concerning. A high level of scrutiny, particularly regarding overheating protection, must be applied to any single-aspect provisions.

GLE3: Data centres

Providing data centres with a specific planning framework is an encouraging step that reflects their unique risks. We support requirements to identify suitable areas based on electricity and water capacity. Since 2022, electricity grid constraints caused by data centres in West London have temporarily stalled housing connections[25]. Some data centres have applied for connections to the gas grid.[26] If new developments are not managed appropriately, this could imperil the Mayor's housing and low carbon energy targets. We would recommend that any planning framework aligns with other energy system planning and management, such as the Regional Energy Strategic Plans (RESPs), and grid connections reform. We also support requirements around heat recovery, on-site renewable generation, and to manage backup generator impacts.

We are concerned, however, about the lower threshold for developments in London's Grey or Green Belts. The Mayor has identified the Grey Belt to unlock affordable housing, so a massive increase in data centres here could compromise these plans. We urge a high level of scrutiny for any planned data centres on Grey or Green Belt land. A developer's desire to move quickly should never override proper assessment of local impacts.

While we support considering heat recovery options, this could be complicated in practice. In theory, the massive amount of waste heat produced by data centres provides an opportunity to capture this surplus heat and integrate it into local district heating networks to help decarbonise urban heating. However feasibility is highly dependent on location, temperature grades, and other factors[27]. It's also worth noting that data centre production often operates on much faster timescales than heat network development. Capturing this waste heat requires careful coordination by the GLA between planning authorities, data centre developers, and heat network

[25] Greater London Authority, Data Centres delay housing delivery, 2025
[26] Ofgem, 2026, Gas system connections and access arrangements: call for input
[27] Greater London Authority, Optimising Data Centres in London - Heat Reuse, 2025

developers, who will be operating to new technical standards that have yet to be finalised, as well as the government's new heat network zoning regulations.[28]

The Plan currently fails to acknowledge the risk that excess data centre heat could increase the Urban Heat Island effect[29]. There should be a requirement for developers to clearly demonstrate how this outcome will be prevented.

Finally, the government's designation of data centres as Critical National Infrastructure may impact the GLA's decision-making ability. This was recently seen when MHCLG approved an East London data centre despite opposition from the local council and local campaign groups[30].

GHR1: Energy-efficiency

We welcome the Mayor's proposal to set strict absolute Energy Use Intensity (EUI) and Space Heating Demand (SHD) targets. Reducing demand through efficient fabric, design and ventilation is more effective and affordable for residents than active solutions. We strongly support removing the "carbon offset" payment option, ensuring all new homes provide necessary seasonal protections. In particular, removing the "carbon offset" payment option ensures all new homes provide necessary seasonal protections. Further, requiring post-construction monitoring of in-use energy demand for five years alongside maximising on-site renewable energy production and storage will help reduce grid pressure and resident bills.

GHR2: Low-cost low-carbon heat

We welcome the shift toward an outcome-led approach that assesses individual systems on equal terms. Prioritising the lowest-cost and lowest-carbon site-specific solution is pragmatic, and we support requiring a Low Carbon Heat Appraisal for major developments. Crucially, we support assessing end-user costs alongside upfront costs to protect consumers from unaffordable bills. We do, however, seek further clarity on how the balance between "low-cost" and "low-carbon" will be weighted, to ensure end-user affordability is not compromised.

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[28] DESNZ, Heat network technical standards consultation, January 2026.
[29] Marinoni et al, The data heat island effect: quantifying the impact of AI data centers in a warming world
[30] The Guardian, Approval of east London datacentre labelled 'slap in the face' for local democracy, 2026

There is a question over how strict the requirement is for developers to actually follow and implement the optimum solution identified in their Low Carbon Heat Appraisal. There must be robust enforcement mechanisms to prevent developers from bypassing the appraisal's findings in favour of systems that are cheaper to build but more expensive to run.

Furthermore, the Low Carbon Heat Appraisal must assess consumer experience elements, like system reliability and comfort. As noted in our summary, previous rollouts of heat networks without adequate consumer protections led to poor outcomes for some Londoners. If the consumer experience is poor, this could damage consumer trust and ultimately slow down the energy transition in the future.

We support the proposal that optimum solutions must comply with the government's Heat Network Zoning Regulations. The detail will be key in terms of how this policy interacts with the government's Heat Network Zoning Regulations. Our priority for heat network zones is to make sure consumers aren't materially disadvantaged - either by higher cost or poorer quality - by connections to heat networks. Clear guidance will be required to prevent confusion between local appraisals and national zoning mandates.

Additionally, we strongly support the waste heat proposals. Requiring relevant developments to assess the viability of supplying a heat network, prepare a waste heat utilisation plan, and optimise infrastructure for heat capture will be essential for supplying current and future networks cost-effectively.