

Towards a new London Plan

Response by London Forum of Amenity and Civic Societies

Section 1 - The London Plan – Introduction

Paragraph 1.1: What is the London Plan?.

Paragraph 1.2: What years will the new London Plan cover?

Paragraph 1.3: How many homes will it plan for?.

The London Forum of Amenity and Civic Societies understands the requirement set by Government to build 880k homes across London over the next ten years. We also understand that this target will put unprecedented pressure on all London boroughs to increase the scale, density and height of developments. But we stress three points:

- First, the formula used to create the London-wide target is not an assessment of need. Rather, it is based on arbitrary and demonstrably-false assumptions about the replacement rate and affordability. It is **not**, as it is frequently termed, an assessment of housing need.
- Second, it takes no account of the almost total reliance in many London borough of the almost total reliance on previously-developed land for the development of new homes.
- Third, we have seen no evidence for the underlying assumptions that an increase in the number of consents, still less the planned number of new homes, will materialise; nor that this would reduce house prices or rents.

Paragraph 1.4: Viability and delivery

We understand that the London Plan is not a delivery plan. But it must address the challenges set out in paragraphs 1.3 and 1.4. The Mayor's Foreword states that "The government has said London needs 88,000 new homes per year. So the next London Plan needs to plan for 880,000 homes, ten years' supply."

We believe that before accepting the 87,992 pa new homes target figure the Mayor should have carried out a SHLAA and SHMA analysis; and that following that analysis, there should have been discussions with the Government on the actual housing need in London and the feasibility of achieving it. The overall housing target that has been handed down is not based on an assessment of either need or practicability, and will put a great deal of pressure on both the GLA and the London boroughs to greatly increase the scale, density and height of developments. Those will need additional social and transport infrastructure which will be difficult to fund. Moreover, we are concerned that the Mayor may be seeking to override powers/requirements for local plans to identify both the sites and whether the location is appropriate for tall buildings.

As we note in responding to 1.3, the new Standard Method and the formula on which it is based represent a "one-size-fits-all" approach inappropriate to London. The replacement rate is lower than in other regions/cities, because of the heavy reliance on previously-developed land (over 95% in most boroughs); and the affordability issue is more extreme.

Moreover, the formula uses earnings data that the ONS admits to being unreliable in many cases. The data excludes self-employed earnings, or earnings other than from employment, and so do not present anything like a full picture of average earnings. At borough level, the data used by the Government are highly-inconsistent with ONS published tables. More fundamentally, workplace-based earnings do not take account of the reality of London's economy and society, where people cross borough boundaries to work. Rather, resident-based earnings data – which show very different patterns – are the only reliable way to measure affordability across London boroughs.

Finally, the house-price part of the affordability element in the formula excludes rent, which makes it utterly unreliable across London.

For all these reasons, a London-based approach to assessing actual housing need and the practicability of the target is essential. When allocating targets to individual boroughs, it is essential that the basic flaws in the Government's new formula must not be used, but rather a formula based on the SHLAA and SHMA analysis to which we have already referred.

The delivery of new homes to meet the target will commence in 2026-27. In the year before that start point, the current issues causing delivery to be far below the 2021 London Plan targets are unlikely to be cleared by then. They are:-

- There has been a significant downturn since Autumn 2024 in both applications and construction
- Proposals by Government on biodiversity and nature recovery are adding costs for developers
- 300,000 homes in London have permission but are not being built (7.5 years' supply)
- Councils spend £114 million monthly on temporary accommodation
- Short term rentals (Airbnb) in 2024 averaged 51,000 in London
- 87,000 homes are long-term empty or second homes

We are concerned already about the large number of unimplemented consents, especially the "pipeline" of tall buildings identified by the New London Architecture's Annual Survey of Tall Buildings. Over a decade of surveys (2013-2023) this shows 280 buildings of 20 storeys or more were completed, whilst there were still 580+ projects in the tall buildings pipeline - the equivalent of a 20-year supply even before any more being permitted. About 90% of these are residential towers. It is estimated that there are more than 110,000 homes "locked up" in these consents, alone. This is over a third of the total number of the more than 300,000 homes consented but not built out. Whilst some of these may be under construction, many may only have made a "material start" to ensure the consent is in perpetuity. The GLA's Datahub unit needs to explore this and provide data on it. Meanwhile the Government is currently consulting on whether and how to tackle this backlog.

Nevertheless, we recognise that the London Plan will need to have policies to ensure that the maximum contribution is achieved from tall building developers for affordable homes. However, few have produced even 10% affordable units. Also, developers must be prevented from proposing market homes and Build to Rent schemes where London's local authorities have designated sites for social housing.

Viability for proposed schemes is becoming a serious problem, as the Mayor explains in the fourth paragraph of the foreword and in paragraph 1.4, partly due to higher materials and construction costs. In considering that and the lack of adequate Government funding to London for truly affordable new housing, there must be a review of the application of the Mayor's Fast Track system for planning applications.

It has been applied to an increased percentage of schemes from 27% in 2018 to 66% in 2022 and more since then. It seems to provide more affordable housing than viability tested applications.

London Plan policy should promote the use of viability reviews at each stage of scheme implementation under legal agreements at the approval time of completed schemes to enable recovery of excessive profits that development might achieve.

Biodiversity net gain and the Government's proposed Nature Recovery Levy could also affect liability but may not apply to small developments.

Paragraph 1.4 states that "Opportunities [*in the new London Plan*] will also be taken to streamline requirements and speed up consideration of planning applications." That will depend upon the Government's policy and proposed action on stalled schemes that will emerge from the Planning and Infrastructure Bill and the Planning Reform Working Paper on 'Speeding up Build-out'.

It will be important that the sites identified by the Mayor's review for development in the Green Belt have all the required infrastructure and are focused on public transport nodes.

Paragraph 1.5: What is this document about?

We welcome the renewed emphasis in the document on securing improvements to accessibility and connectivity.

The priorities for the London Forum and its members are the delivery of many more social rent and low-cost rent homes of a quality that meets the New Homes Standard. We also stress the importance of protecting MOL and its enhancement for public access and use. Unimplemented planning permissions must be accelerated for their delivery or the sites returned to the local authority.

See our comments below on paragraph 2.6 of the consultation document on industrial land.

Paragraph 1.6: Legal and procedural requirements

Paragraph 1.7: Integrated Impact Assessment (IIA)

Paragraph 1.8: Habitats Regulations Assessment (HRA)

Paragraph 1.9: Beyond London

We agree that "There may be opportunities for joint work to plan for growth across London's boundary."

Paragraph 1.10: Good growth objectives

We strongly support the current policy GG1 for delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspaces in accessible locations, built forms that work with local heritage and identity, and social, physical and environmental infrastructure that meets London's diverse needs. These are all essential if London is to maintain and develop strong and inclusive communities.

Existing Policy GG2 D for applying a design-led approach to determine the optimum development capacity of sites will need more guidance in the new Plan. In particular, there will be a need to explicitly include issues of public transport accessibility, capacity and connectivity.,

Existing Policy GG3 for creating a healthy city needs an extra section for dealing with overcrowded housing and the inadequate type of flats created by permitted development of office blocks in the wrong way and in unsuitable locations.

Existing Policy GG4 B for “50 per cent of all new homes being genuinely affordable” is likely to be an insufficient percentage now that there is such a lack of social rent homes and 183,000 people are in temporary accommodation. Jules Pipe told a conference organised by London Forum and The London Society that “We calculate something like two-thirds of the 52,000 [current] annual target should be in social housing.”

Good Growth should focus on sustainability and the economic benefits of open space and play space have to be recognised to avoid additional costs on the NHS as quality of life deteriorates.

One aspect of sustainability is refurbishment, rather than demolition and rebuild.

11. Paragraph 1.11: The key diagram

The location of major development will be highly dependent upon the need to extend and upgrade the public transport network. But the Spending Review means that this is unlikely to be achieved. And even the “key initial priorities” would have been insufficient to support the first ten years of growth.

Opportunity Areas: Progress

We welcome the proposed Opportunity Area review, recognising the differences in the rate of progress of build out of them. It is important that the review should be transparent in seeking evidence and making it publicly available. In addition, as a result of changing circumstances, we would expect some of the housing and jobs targets to be reviewed to reflect any changes in the area of the Opportunity Area and the acknowledgement that the prospect of transport infrastructure improvements has been reduced following the 2025 Spring Statement’s allocation of inadequate funding for London

We note the strong dependence on transport infrastructure investment which is holding back progress of several Opportunity Areas in many cases this is not likely to be resolved within the life of the next London Plan.

See also our response to Section 2 paragraph 2.3.

Section 2 - Increasing London's housing supply

The first sentence in Section 2 states that “London has been delivering between about 30,000 and 45,000 homes a year for the last decade.” That emphasises the improbability of delivering 88,000 new homes a year for some time as shown by Figures 2.1 and 2.2, which make clear that there has to be clarity on the causes that limit the number of new applications and prevent consents being built out. The new London Plan in its policies and the new homes targets it sets for each borough will have to address some of the causes or accept the limitations imposed by ones that cannot be mitigated.

The introduction to Section 2 rightly states that the priority to increase the quantity of affordable housing relies on increases in public subsidy. Similarly, the 880,000 target for new homes depends on a major increase in public investment in transport. The new London Plan itself must address the question as to what should happen if the necessary subsidy and investment is not provided by central Government. The 2025 Spending Review allocated inadequate funding to London.

We must stress once more that the 880,000 ten-year target is not a bottom-up assessment of housing need, but the output of the Government’s new Standard Method formula for delivering 1.5

million additional homes in England by the next General Election. We are concerned that the scale of “need” may be distorted by the assumptions made in the Standard Method calculation, especially if there is no testing of their suitability for assessing need in London. (See our comments on this in our response to paras 1.3 and 1.4 in Section 1 above)

It should be a basic requirement that the next London Plan should start from an assessment of how it can meet the housing needs of London’s population, drawing on the latest ONS data, including a full demographic analysis of the data on migration into and out of London from the rest of the UK as well as from overseas; and survey data on hidden households. New versions of the SLAA and the SHMA will be essential base documents.

We agree that the higher volumes of development and sustainability critically depend on good public transport connections and a high-quality safe environment for walking and cycling. It will also depend on the accessibility to public transport and its capacity and suitability for the destinations that new residents will require and focusing new housing in locations with good access to town centres.

We agree that there is a significant time-lag between setting a target and the delivery of completed homes. It will be some time before the new borough-level housing targets show up in annual completion figures; something the Government has not yet taken on board in projecting the completion of 1.5 million net additional homes by the next General Election.

The Government’s introduction of Compulsory Purchase without consideration of ‘hope value’ may need a London Plan policy for how that could be used for land assembly, avoiding the need for more tall buildings on restricted area sites.

Paragraph 2.1: A brownfield first approach

This approach has been the practice since 2000 - as previously-developed sites are almost the only sites available. We consider that there is need to refocus on building in locations with high public transport accessibility and capacity, and good accessibility to social infrastructure and optimising the use of these sites.

Almost all development sites have been previously developed - the overall rate is well over 95% in most London boroughs . We agree that the development potential of all sites should be optimised, and we recognise the need for higher densities across London. We stress, however, that higher densities do not necessarily imply tall buildings. Focusing development on sites with good public transport should be the main priority because these locations are best able to support higher-density living.

Paragraph 2.2: London's call for sites - LAND4LDN

The density of development must be a function of accessibility/connectedness.

Is there a borough-by-borough assessment of the capacity of homes in existing unimplemented permissions? Is there an assessment of the accessibility of each site?

It is essential that the new London Plan should include a clear plan to incentivise the completion of the 250,000-plus homes consented but not yet built on large sites

Paragraph 2.3: Opportunity Areas

We welcome the review of Opportunity Areas and their reclassification in terms of their progress. With 47 Opportunity Areas, the GLA has spread its resources too thinly. Some have been developed, whereas others, in particular because of lack of transport infrastructure investment,

have made little or no progress in 15 years and, in some cases, have no prospect of securing this within the life of the plan.

We note the likelihood that CrossRail 2 will not be built in the period covered by the new London Plan and the consequent need to re-assess Opportunity Areas in south-west London. We fear, following the Spending Review, that the same may now apply to areas of east, south-east, and north-west London.

We urge that consideration should be given to interim measures to improve transport connectivity for any stalled Opportunity Area.

However, we recognise that for some it will be necessary to accept that this can be no more than a holding operation. Early acceptance would be better than hanging onto a fiction - such as at Kensal Canalside, where a scheme based on a possible Crossrail/Elizabeth Line station has been used to justify retaining a scheme with poor public transport accessibility, capacity and connectivity.

A more thorough review of the capacity and deliverability of Opportunity Areas is needed, especially where circumstances have changed due to a reduction in the size of area (eg Old Oak/Park Royal, Earl's Court/West Kensington) or where transport investment has not materialised (eg Kensal Canalside).

The delay in delivery of HS2 by 9 years brings a significant change of circumstance at Old Oak/Park Royal. We note that the Mayor has a statutory duty to review MDCs 'from time to time' under S215 of 2011 Localism Act. In all these cases the review of Opportunity Areas should provide revised estimates of the number of new homes they can deliver and the number of additional jobs that will be achieved. The location and types of those new jobs should be related to the Mayor's promotion and development of Strategic Outer London Development Centres (SOLDC) as in Policy E8 G of the 2021 London Plan.

Paragraph 2.4: Central Activities Zone

London Forum of Amenity and Civic Societies recommends that the boundary of the CAZ should be redrawn, excluding areas which have no CAZ function. The area of the CAZ needs to focus on those parts which are related to the CAZ policies, excluding primarily residential areas, the major parks and the cultural areas, all of which are the subject to their own non-CAZ policies. A loose association with or proximity to the CAZ is not sufficient because CAZ policies are not relevant to their development.

London Forum supports strongly the London Plan's Strategic Views and the application of the View Management Framework. However, the discussion of this policy issue reveals just how limited the London View Management Framework is, reflecting its origin in the protected views of St Paul's, and that the focus of the vast majority of the other views is on the CAZ.

We support the River Prospects, which we consider should continue westwards beyond the CAZ boundary. The lack of protection of some of the Thames Policy Areas has resulted in poor quality of development along the Thames which harms the heritage value of the Thames frontage.

The Thames Policy Areas are supported by Thames Landscape Strategies, adopted by boroughs, for sections between Hampton and Chelsea, but there should be such strategies of a similar quality from Chelsea eastwards to the end of the GLA part of the Thames corridor. We propose that the new London Plan revives and expands the concept of Strategic Views, especially outside the CAZ.

See also our comments on paragraph 4.2 on tall buildings.

Paragraph 2.5: Town centres and high streets

London Forum of Amenity and Civic Societies supports policies that focus on town centres for higher-density development. However, we consider that this development should be additional to the existing mixed-use development, not in place of those uses.

A strong emphasis should be placed on densification of areas in or near town centres, and building on car parks; and we stress once more that higher density does not necessarily imply tall buildings.

Paragraph 2.6: Industrial land

The new London Plan must consider the intensified use, location, retention or replacement of industrial land.

We supported the draft version of the current London Plan which proposed a policy of co-location and we supported the GLA at the Examination. We were disappointed that the last Government directed that the policy was omitted. We support its reintroduction to the next London Plan.

Any further use of industrial land for housing must take the form of co-location, especially in Inner London boroughs where any further loss of industrial land should be resisted.

Paragraph 2.7: Wider urban and suburban London

Extensions to existing housing may be welcome in some cases, but often they simply add to the space available for existing householders, rather than providing any additional homes. In many areas of inner London, where Victorian terraces have been extended, the population densities are lower than they were thirty years ago, with more space but no more people.

Thus, whilst producing “intensification” in terms of habitable rooms per hectare, there may be no increase in dwellings/hectare, and where this produces larger, more expensive houses, it often produces lower population densities, as the housing becomes less affordable for families.

More guidance is needed to support redevelopment that could increase the number and density of homes, rather than rooms.

Paragraph 2.8: Other sources of housing supply

The current level of delivery of new homes has been recently less than half of the target the Government has imposed. We are concerned that this situation will take some time to be resolved. It is unlikely that the Mayor’s review of the Green Belt could locate sites for over 40,000 new homes each year to compensate for past under-achievement against targets.

Paragraph 2.9: Beyond London's existing urban area

We support a review of the Green Belt within London, and accept that every bit of land that was so designated in circumstances very different from now, more than seventy years ago, should not be treated as permanently sacrosanct and excluded from development. We accept that this will have an impact on Outer London boroughs, particularly Bromley, Havering and Hillingdon.

Unlike the latest NPPF, which fails to define the criteria for identifying sustainable sites, the London Plan can and should define clear criteria for building sustainable, liveable neighbourhoods, with good connectivity and access to public transport and a wide range of local social infrastructure.

If the 'Grey Belt' land identified by the Mayor's Green Belt review is to contribute to meeting London's housing needs, it should contain a significant portion of social and low-cost rent homes. New homes in Grey Belt must be fully sustainable in terms of transport and social infrastructure, energy-efficient buildings and sustainable urban drainage.

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

We support the Mayor's aims for creating affordable, well-planned, well-connected neighbourhoods with densities that support public transport and a local economy. But we repeat the requirements we set out in our response to para 2.9.

Paragraph 2.11: Metropolitan Open Land

We strongly support the Mayor's policy to protect Metropolitan Open Land. Unlike Green Belt, Metropolitan Open Land is designated specifically for its contribution to the city's structure, providing space for recreation and sport, and containing features of historical or biodiversity value. Its main difference is that it is specifically designated for the benefit of Londoners. We support also the proposed review of golf courses. We would, therefore, strongly oppose any suggestion that an existing area of MOL should be removed and made available for large-scale development.

Paragraph 2.12: Affordable housing

We agree with the issues identified in the consultation document arising from the failure in the past to deliver a sufficient number of truly affordable homes. In light of the four problems in the delivery environment described in the consultation document, there will need to be new policies to deal with the backlog of need for social housing.

Paragraph 2.13: Planning for affordable housing

We agree that the Plan must drive increased delivery of affordable housing (even though the Plan is not a delivery plan). We welcome a review of the threshold for viability testing, and agree on the need to avoid different thresholds at the borough level. Nevertheless, we support a higher threshold for public land. But is a 50% threshold practicable on London's Grey Belt land?

We also strongly agree on the need to focus on social rent housing and support a new London Plan approach to put more emphasis on social housing tenure in line with national policy at 50%, as in the consultation paper 2.13.

We await the publication of the Mayor's revised Housing Strategy and his updated Affordable Housing London Plan Guidance before we can comment further on low-cost rent and 'intermediate' homes. Hopefully, all such Strategies and LPG documents will be available before the publication of the draft new London Plan.

Paragraph 2.14: Estate regeneration

We agree on the tightening of rules on loss of social rent housing in regeneration schemes, including floorspace. We do not understand why any residents of social housing do not have the 'right to return'.

Paragraph 2.15: Build to rent

Paragraph 2.16: Other housing options

We support the supply of mixed-use and specialised housing.

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

We do not support a dirigiste approach in the London Plan. Rather, it should provide guidance and require boroughs to address the issues in their local plans.

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

We recognise that purpose-built student accommodation is required in London but too much of it seems to be in prime locations. Students should be provided with travel concessions so that their living quarters can be built in areas of outer London where there is less of a demand for social housing. However, significant 'student dormitories' as at North Acton cause harm when dominant. The present London Plan Policy and Guidance on PBSA and the new London Plan should set different parameters for 'over-concentration' in areas with no university presence or campus.

Paragraph 2.19: Gypsies, Travellers and Travelling Showpeople

No comment

Section 3 - Growing London's Economy

London Forum agrees that the outcome of the Government's changes to Use Classes will need to be taken into account in preparing the new London plan, but we suggest there have been some adverse implications from the implementation of Class E which should be examined with boroughs.

Paragraph 3.1: The Central Activities Zone

We support a review of CAZ boundaries - see our full comments on this in Paragraph 2.4.

Paragraph 3.2: Specialist clusters of economic activity

We believe that there is a much larger range and diversity of clusters than have been identified to date. Hence, we would welcome an exercise to identify them, specifying the policies that support or protect them and the kinds of support that would help them to thrive and to enhance their impact across London.

The current London Plan's references to Outer London Development Centres should be enhanced by further consideration of the recommendations of the Outer London Commission on that subject.

Paragraph 3.3: Town centres and high streets

We believe that flexibility in terms of the range of businesses in town centres is essential in supporting and enhancing the roles of town centres and high streets, which differ hugely in character and scale, and in their strengths and weaknesses and the roles that they play. Hence, we believe that policies should respect this diversity, and that key responsibility must lie with boroughs, rather than any more dirigiste London-wide approach.

However, there has been a rapid change in the uses in some town centres, especially those with underground stations and major offices, where food and beverage outlets are crowding out other shops and services, radically changing the balance of uses in these centres.

We would support more housing in mixed-use developments which retain active frontages; but we would welcome the use of Article 4 directions to avoid gap-toothed developments that detract from the key functions of town centres and high streets.

Boroughs should be encouraged to review town centre boundaries; and we would support a review of designations and classifications, such as those in CAZ.

Consideration needs to be given to the introduction of High Street Rental Auctions with related new London Plan policies and advice to boroughs.

Paragraph 3.4: Industrial Land

We strongly support:

- protection for strategic industrial land, especially in inner London;
- the setting of borough-level targets for capacity;
- the promotion of logistics and related uses; and more broadly,
- the intensification of the use of industrial land.

We also support co-location and multi-storey developments, which have so far been very limited, and not helped by the recent draft London Plan Guidance LPG.

See also our response on industrial land for paragraph 2.6.

Paragraph 3.5: London's night-time economy

We support the suggested identification of clusters and the use of the agent of change principle. However, it is important to recognise and protect the interests of local residents, and to distinguish clearly between what is reasonable to accept between 6pm and midnight on the one hand, and midnight and 6am on the other. There is a need to differentiate more clearly between the 6pm-midnight/evening economy and the midnight-6am (night time) economy. The former includes the cultural night-life - culture and eating whilst the after midnight economy relates more to drinking, dancing and music.

The previous classification of town centres with a night-time economy was hard to read and understand, and, in some cases, to relate to each London town centre.

There is confusion/conflation in the current London Plan between cultural quarters and strategic clusters of cultural attractions, which are predominantly daytime venues rather than evening let alone night-time attractions. The classifications need rethinking, but more importantly they need better definitions and more accurate classification in terms of the night-time economy.

Paragraph 3.6: Culture and creative industries

There is a need to map the clusters of culture and creative industries in order to generate a strategy for supporting these industries. The next London Plan should further develop the agent of change principle as a means of protecting London's cultural and night-time uses in a more strategic and place-based way. We strongly support measures to identify and support creative enterprise zones.

Paragraph 3.7: Visitor economy

We support the development of hotels and other facilities for visitors across London. However, there is an urgent need to address the problems caused by the growth and concentration of short-

term let properties, which have led to a significant loss of homes for permanent residents in many parts of inner/central London, which are causing disruption to the lives of neighbouring residents.

There is a major contradiction between the growth of short-term tourist accommodation and the impact on the supply of housing. In some Central London areas, the “loss” of housing makes a nonsense of London Plan housing targets if they exceed the annual net additional homes delivered.

The current London Plan already supports hotels in the CAZ, town centres and locations with good public transport accessibility, but also recognises that there are already areas with a high concentration of hotels.

Paragraph 3.8: Digital infrastructure

We recognise that digital infrastructure has changed considerably over the last decade and that the new London Plan will need to reflect and promote this change.

We acknowledge and support the need for a strategic approach to data centres, which we believe should not be left solely to individual boroughs, as such centres have a significant demand for electricity supply and have an impact on local network capacity.

Paragraph 3.9: Access to employment

We would not support an increase in the use of planning obligations to promote access to employment. We believe that they are a blunt instrument for that purpose, and that other measures are available.

Paragraph 3.10: Affordable workspace

We would be cautious also about extending requirements for affordable workspace beyond office and industrial developments to other kinds of development. At the same time, we have strong reservations about removing the same-site requirement.

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

1. Paragraph 4.1: Building height and scale

We accept that, to accommodate the large-scale increase in homes, new housing will need to be at higher densities across London. This will involve producing an increase in density, height and scale, which reflect transport accessibility to jobs, education and health, but also to a wide range of local social infrastructure and services.

Redeveloping outwards from town centres and stations is already part of the current London Plan's Good Growth agenda. Indeed, this has been policy and practice since the 1930s (such as building blocks of flats near suburban stations) and more recently, although piecemeal, it has happened through redevelopment. Increased height through upward extension may increase the built density, but seldom increases the housing density in terms of dwellings per hectare.

Nevertheless, there will be a need to reflect London's heritage assets, such as listed buildings and conservation areas and archeological remains, although these, especially in Inner London, are

often areas with some of the highest densities. Indeed, their densities are an integral part of their heritage value.

Whilst the London Plan can and should set the direction of travel, the issue of building heights and design codes should be a local plan matter tailored to local circumstances. We believe that design codes should remain a borough responsibility.

There is a role for the GLA in producing a design code/guidance for small sites. This would need a policy “hook” in the London Plan.

Paragraph 4.2: Tall Buildings

We strongly support a plan-led approach to the identification of suitable locations for tall buildings brought forward through London borough local plans. We are, however, concerned by the slow progress of London boroughs in revising their local plans.

We applauded the “delegation” of this issue to London borough local plans in Policy D9 of the current London Plan. We strongly believe that defining locations for tall and medium-height buildings should remain a requirement for borough local plans.

However, we are very concerned by the GLA’s reinterpretation of Policy D9. A suggestion that “all tall buildings are assessed on their individual merits irrespective of their location” undermines the plan-led approach of identifying appropriate locations. The legal requirement of determining applications in accord with the development plan, unless material considerations indicate otherwise, would suggest that the burden of proof is on the developer for overriding the development plan.

The GLA’s intervention on behalf of proposals for tall buildings, especially when there is no genuinely strategic reason, devalues the status of the local plan. We are thus concerned that Mayoral interventions have overridden London boroughs seeking to manage the development of tall buildings outside these locations.

The location and suitability of tall buildings is only occasionally a strategic matter. The 2021 London Plan recognised this by delegating to London boroughs the task of identifying suitable locations for tall buildings, thus securing a plan-led approach. The suggestion that tall buildings can be proposed anywhere and can be assessed on their individual merits irrespective of their location is the antithesis of a plan-led approach and a misreading of the London Plan. The Mayor has the opportunity to object to local plans, but if he has not done so, what strategic reasons could he have for intervening in favour of an individual tall building that is contrary to the local plan?

The consultation suggests that thresholds for referring tall buildings to the Mayor could be altered. We would strongly object to reducing the height thresholds of developments that are referred to the Mayor, especially along the Thames, as the purpose of the 25m threshold was to protect the Thames Policy Area.

Successive Mayors (and GLA planners) appear to have failed to understand this, or have, on the contrary, decided to use reference to the Mayor or even Mayoral call-in to promote tall buildings along the Thames. As a result, the height, scale and quality of buildings developed along the Thames in the last 20 years has been shameful. Many of these buildings have been referred to the Mayor, but they do not appear to have been assessed in terms of the harm they do to the character of the Thames Policy Areas and views across and along the Thames.

A recent case - Glassmill at the southern bridgehead at Battersea Bridge - is an honourable exception. The Mayor did not intervene to call in Wandsworth’s decision to refuse consent for a 29-storey building.

Rather than reduce the threshold for Mayoral reference or intervention, the new London Plan should be reviving the purpose of the Thames Policy Area to protect the Thames, and, in addition, identify views across and along the Thames through both protected views and panoramas as part of the review of the View Management Framework. The Thames is an iconic asset for London - increased emphasis should now be given to protecting this asset.

We strongly believe that defining areas for tall and medium-height buildings should remain a requirement left to the boroughs rather than the Mayor. Similarly, we believe that design codes should be a borough responsibility.

The report of the Assembly Planning and Regeneration Committee on living in high-rise developments and their recommendations should be considered for any policies needed in the new London Plan.

Paragraph 4.3: Supporting a denser London linked to transport connectivity

We strongly welcome the recognition that to achieve London's "national housing target", "it will be even more important to understand and strongly link to transport connectivity". As we move toward higher densities, the new London Plan needs to put greater emphasis on development in "the right places" - places which have or will have higher PTAL scores and the capacity to support the developments.

We particularly support the development of a new TfL metric to supplement the PTAL measure, for guiding the assessment of large-scale developments. Even though the current London Plan uses public transport accessibility as a locational guidance tool for Good Growth, this appears to have been omitted, downgraded and overtaken as a tool for assessing the sustainability of developments, in favour of a "design-led approach". It is crucially important that any new metric should include an assessment of transport capacity - both of the service and stations - and the destinations the transport facilities serve.

We welcome the prospect of reintroducing accessibility considerations into identifying, allocating and assessing suitable locations for higher density, building heights and scale of developments.

We have concerns about the practicability of 'metro-isation' of rail services in areas where track capacity is already very constrained, especially during morning and evening peaks. We do however support improvements to public transport capacity and frequency of services.

We would support the extensions of the Bakerloo Line and the Docklands Light Railway and West London Orbital route (though we believe that the latter is unlikely to stimulate much large-scale development). However, these projects were not approved in the Spending Review on 11 June 2025. As we note in paragraph 2.3, the loss of Cross Rail 2 for the period to be covered by the Plan is a major disappointment in terms of providing major development sites well-served by public transport.

Paragraph 4.4: London's heritage

We regret that the Mayor has not taken a stronger stance in seeking to protect London's World Heritage sites; and that there is a real risk of losing the Tower of London site's designation.

We would not support a specific policy in the London Plan for retrofitting heritage assets for energy efficiency. We believe this requires a national approach.

Paragraph 4.5: Designing the homes we need

It is imperative that liveability requirements are tightened up. On daylight and sunlight in homes, for example, it seems to have become acceptable that already minimal standards are allowed to drop in some cases with more than 20% of dwellings in a proposed development receiving inadequate, or even no, sunlight at all. Minimum standards should be sacrosanct across the board. If a scheme is designed too densely, it cannot achieve even the minimum standards. We should not be building homes that in years to come will be seen as unliveable or having negative impact on residents' health. Numbers at any cost are not the answer.

Paragraph 4.6: Heat risk, ventilation and overheating

Single aspect flats, whether north or south looking, must be avoided.

Paragraph 4.7: Homes for families

Issues of housing mix are currently largely left to local plans, and should remain there as policies need to reflect local demographics. We believe that the current London Plan's over-emphasis on studio and one-bed or two-bed units has been damaging, creating a shortage of family-sized housing in London. That is especially the case in the social housing sector, leading to high levels of movement out of London, and acting against the aim of developing stable communities.

There is now a severe risk that, in the pursuit of higher housing targets, developers will propose, and boroughs will approve, ever-higher numbers and proportions of studio and one-bed homes, large-scale co-living developments, and student housing. This will be at the expense of those families that desperately need family-sized homes appropriate to their needs. Such an outcome must be resisted at all costs.

Strong guidance to boroughs on measures to avoid loss of family homes may have a marginal impact. However, the key need is for more affordable family housing.

Paragraph 4.8: Accessible housing

Paragraph 4.9: Space standards and other requirements

We support retaining the current London Plan space standards, with the additional requirements, compared with building regulations on ceiling heights and open space.

Paragraph 4.10: Designing for everyone

We strongly support a requirement for full community engagement in relation to large developments. Other issues should be left to boroughs, with a requirement to address them in local plans.

Section 5 - Infrastructure, climate change and resilience

We recognise that the planning regime and private developers cannot provide all the infrastructure that is needed. But the London Plan needs to take account of the constraints on public funding,

and to acknowledge the impact of those constraints. This could be repeated as a refrain in responding to several paragraphs in this section.

One example is that the current Plan goes beyond the national requirements to meet net zero. There is a need to recognise the implications of that.

Paragraph 5.1: Energy efficiency standards

We would not support reducing current standards, which should be incorporated in guidance as minima, while encouraging boroughs to follow the latest industry best practice. We are highly sceptical about carbon offsets; the London Plan should aim to set standard requirements to be met across London.

Paragraph 5.2: Heat networks

We agree that duplication of national requirements should be removed.

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

We support the setting of benchmarks for assessments and reporting.

Paragraph 5.4: Waste

We support updating borough targets and requiring boroughs to ensure retention of existing waste sites.

Paragraph 5.5: Green and open spaces

We welcome the development of the London Nature Recovery Strategy and a London Green Infrastructure Framework.

Paragraph 5.6: London's open spaces

We welcome proposals to take full account of existing small open spaces, which become more important as development intensifies. We welcome also moves at a strategic level to identify areas of deficiency in access to open spaces, and we would support measures to require action to address such deficiencies. We note that Good Parks for London offers useful criteria for measuring quality, use, and level of demand. There is a need to provide children's play space that is adequate for each new development and area.

We note also the comment that not all green infrastructure, such as green road verges, provide meaningful open space for people to use. But the Plan should acknowledge that verges and other inaccessible spaces such as railway embankments may have great importance as green corridors for wildlife.

We would welcome any additions to space designated as MOL, and agree that MOL should be treated as separate from Green Belt, and protected from the Green Belt review.

See our comments in earlier sections on the value of open space and the need for children's play space.

Paragraph 5.7: Green infrastructure and biodiversity

We urge that future policy should be based on a review of the effectiveness of implementing the urban greening factor.

Paragraph 5.8: Water

Paragraph 5.9: The strategic importance of London's waterways

The Thames Strategy Partnership and the Joint Thames Strategies need to be hugely strengthened and supported to develop clear strategies to be included in the Plan to protect and enhance the Thames, its tributaries and their immediate hinterlands which play such a crucial part in London's identity and in the daily lives of a massive proportion of its citizens.

The lack of definition of the Thames Policy Areas by boroughs as the 2021 London Plan requires and the support for them by adopted Thames Landscape Strategies for the river sections east of Chelsea has been a serious failure. The replacement London Plan must not allow that to continue. (see also our comments on tall buildings 4.2)

Paragraph 5.10: Flood risk management

We welcome development of the new London Surface Water Strategy and support the strengthening of the requirement for Greenfield Run-Off Rates, and a new requirement to use SUDS-compliant surfaces even in small developments, including where front gardens are paved to provide car parking.

Paragraph 5.11: Water management

Paragraph 5.12: Transport's role in London's growth

We propose that the next London Plan needs to reassert strongly that growth should be directly associated with improvements to transport accessibility, capacity and connectivity, both at the strategic London-wide level and at the local level.

The success of large-scale developments, such as Opportunity Areas, is in many cases highly dependent on major public transport investments but the 2025 Spending Review does not offer London much help. The future of several Opportunity Areas will need to undergo further tests as we have explained in our comments on the review of them.

We believe there is a need for stronger measures to minimise car use. At a minimum, there should be additional charges for large cars in parking bays and for entry into the Central London Congestion Charge zone.

Paragraph 5.13: Sustainable transport networks to support growth

We acknowledge the need for major transport infrastructure projects to unlock growth, but where this is not forthcoming, the future of Opportunity Area needs to be reassessed as is proposed/suggested in relation to Crossrail2 or even just scaled back, such as Kensal Canalside where the previously anticipated Elizabeth Line station is never going to be realised.

However, it is not just major projects that are needed - TfL has a list of major projects to increase capacity on several lines as well as at key stations, including providing step-free access to make the network accessible to all.

More emphasis also needs to be given to sustainable and walkable neighbourhoods, as part of reviving or retrofitting existing communities.

We would support setting a requirement on boroughs to identify proposed interventions to support growth with healthy streets and other measures, including kerbside management.

Paragraph 5.14: Car parking, cycle parking and deliveries

We recognise that not everyone needs or can afford off-street parking and that minimising car parking in new housing, especially where without such parking housing could be both more affordable and at higher densities.

We accept that there is a need to review the requirements for cycle parking in new developments.

Paragraph 5.15: Responding to transport trends and new technologies

Paragraph 5.16: Fire safety

We agree that the new London Plan should make clear how fire safety policies and regulations should be applied, but this does need to be addressed at the National level.

Paragraph 5.17: Air quality

We support setting of benchmarks.

Paragraph 5.18: Heat risk

Paragraph 5.19: Healthy communities

Call for Evidence

Please also note that you can submit evidence to help inform the London Plan through our [Call for Evidence](#). This closes also closes at 23.59 on Sunday 22 May 2025.