

Response of The London Forum to 'Towards a new London Plan'

This document was generated by AI from our full detailed responses to individual questions, and then proof read and amended by editors, so as to form an accessible public overview.

Section 1: The London Plan – Introduction

London Forum's primary objection in this section is to the Mayor's acceptance of the government's housing target of 88,000 new homes per year. They argue this figure should not have been accepted before a detailed Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment (SHMA) had been conducted to determine London's actual housing needs. The Forum expresses doubts about the algorithm used in the government's standard method, calling it a "one-size-fits-all" approach. They believe this method fails to account for London-specific issues, such as a lower housing replacement rate, a high reliance on previously-developed land, and more extreme affordability challenges.

This top-down target is seen as putting immense pressure on London boroughs to significantly increase the scale, density, and height of developments. The Forum points out that the necessary social and transport infrastructure to support this growth will be difficult to fund.

A significant concern is the number of unimplemented planning consents.

- There are 300,000 homes in London with planning permission that are not being built.
- The New London Architecture's Annual Survey of Tall Buildings shows a pipeline of over 580 projects of 20 storeys or more, containing an estimated 110,000 homes. This is equivalent to a 20-year supply before any new permissions are granted.
- The Forum recommends that the GLA's Datahub unit investigate why so many of these consented homes are not being built.

The Forum also makes several points regarding affordable housing and viability:

- They advocate for policies that enable the recovery of excessive profits from developers through viability reviews at each stage of a project.
- They question the application of the Mayor's Fast Track system for planning applications, even though it appears to provide more affordable housing than viability-tested applications.
- They note that few tall building developments have produced even 10% affordable units.

Finally, while supporting the "Good Growth" objectives, the Forum suggests several enhancements:

- Policy GG2 D, which applies a design-led approach to determining development capacity, needs more guidance, particularly regarding public transport accessibility and capacity.
- Policy GG3, relating to creating a healthy city, should be expanded to address overcrowded housing.
- They believe the target in Policy GG4 B for "50 per cent of all new homes being genuinely affordable" is likely now insufficient. They cite Jules Pipe, who stated that around two-thirds of the current annual target should be for social housing.

Section 2: Increasing London's Housing Supply

The Forum reiterates that delivering 88,000 new homes a year is improbable, given that London has only been delivering between 30,000 and 45,000 homes annually for the last decade. They argue that the new plan must start from a bottom-up assessment of London's housing needs, using the latest ONS data and new SHLAA and SHMA documents.

Key points on development strategy include:

- **Brownfield Land:** While supporting a "brownfield first" approach, they note this has been standard practice since 2000, as over 95% of sites in most boroughs are previously developed. The focus should be on optimising sites with high public transport accessibility.
- **Opportunity Areas:** They welcome the proposed review of the 47 Opportunity Areas, noting that the GLA has spread its resources too thinly. Many areas have made little progress due to a lack of transport investment, such as at Kensal Canalside, or have seen circumstances change, as at Old Oak/Park Royal. The lack of funding for Cross Rail 2 necessitates a reassessment of Opportunity Areas in south-west London.
- **Central Activities Zone (CAZ):** The Forum proposes redrawing the CAZ boundary to exclude areas that are predominantly residential (like Pimlico), major parks (like Hyde Park and Regents Park), and Opportunity Areas not related to CAZ policies. The key test for inclusion should be whether the area's predominant use promotes key CAZ functions and whether CAZ policies apply.
- **Strategic Views:** They strongly support the existing Strategic Views and River Prospects, and believe the latter should be extended westwards beyond the CAZ boundary. They argue the lack of protection for the Thames Policy Areas has led to poor quality development along the river.
- **Industrial Land:** They support the reintroduction of a policy for co-location of compatible industrial uses and housing, expressing disappointment that this policy was omitted from the last plan at the Government's direction.

- **Green Belt and MOL:** The Forum supports a review of the Green Belt, accepting that not all land designated 70 years ago should remain sacrosanct. They note this will particularly impact the boroughs of Bromley, Havering, and Hillingdon. Any development on former Green Belt ("Grey Belt") land must be sustainable, well-connected, and contain a significant portion of social and low-cost rent homes. However, they are strongly opposed to any development on Metropolitan Open Land (MOL), which they argue should be protected and treated separately from the Green Belt.

Section 3: Growing London's Economy

The London Forum supports the ambitions of the London Growth Plan and reiterates its call for a review of the CAZ boundaries. They believe there is a much wider range of specialist economic clusters than has been identified and would welcome an exercise to map and support them.

On town centres, they argue that policies should respect their diversity and that key responsibility must lie with boroughs. They are concerned that in some town centres, food and beverage outlets are crowding out other shops and services. They also suggest the introduction of guidance for using High Street Rental Auctions.

Key points on the economy include:

- **Industrial Land:** They strongly support the protection of strategic industrial land, setting borough-level targets for capacity, and promoting the intensification of industrial land use, including co-location and multi-storey developments.
- **Night-Time Economy:** It is important to protect the interests of local residents and to distinguish clearly between the "evening economy" (6 pm to midnight, focused on culture and eating) and the "night-time" economy (midnight to 6 am, related to drinking and dancing).
- **Visitor Economy:** The Forum calls for urgent action to address the problems caused by short-term lets, which have led to a significant loss of homes for permanent residents and cause disruption. They point out the contradiction between promoting short-term tourist accommodation while trying to meet housing targets.
- **Digital Infrastructure:** They support a strategic, London-wide approach to data centres, as they have a significant demand for electricity and impact local network capacity.
- **Affordable Workspace:** The Forum would not support an increase in the use of planning obligations to promote access to employment, calling them a "blunt instrument". They also have "strong reservations" about removing the same-site requirement for affordable workspace.

Section 4: London's Capacity for Growth and Design Quality

The Forum accepts that accommodating growth will require higher densities across London, but this must be linked to transport accessibility and social infrastructure. They believe that while the London Plan can set the direction, decisions on building heights and design codes should remain a local plan matter tailored to local circumstances.

A major theme is the approach to tall buildings:

- They strongly support a plan-led approach where boroughs identify suitable locations for tall buildings in their local plans, as set out in the current Plan's Policy D9.
- They are "very concerned" by a suggestion that tall buildings could be assessed on their individual merits irrespective of their location, as this undermines the plan-led approach.
- They are concerned that Mayoral interventions have overridden boroughs seeking to manage tall building development, but welcomed the Mayor's recent decision not to call in a tall building proposal at Battersea Bridge.
- They believe the location of tall buildings is only occasionally a strategic matter warranting Mayoral intervention.
- They strongly object to reducing the height thresholds for referring applications to the Mayor, especially along the Thames, where they describe the quality of buildings developed over the last 20 years as "shameful".

They welcome the proposal to develop a new TfL metric to supplement the PTAL measure for guiding large-scale development. They regret that the Mayor has not taken a stronger stance to protect London's World Heritage sites, noting the "real risk" of the Tower of London losing its designation.

A critical issue is the type of homes being built. They believe the current Plan's over-emphasis on studio and one or two-bed units has been damaging, creating a shortage of family-sized housing, particularly in the social sector. They argue that the pursuit of high housing targets risks creating ever-higher numbers of small units at the expense of families who desperately need larger homes, an outcome that "must be resisted at all costs".

Section 5: London's Infrastructure, Climate Change and Resilience

The Forum stresses that the London Plan must acknowledge the constraints on public funding for the infrastructure needed to support growth.

Key points on infrastructure and environment include:

- **Energy Efficiency:** They would not support reducing current energy efficiency standards and are "highly sceptical" about the use of carbon offsets.
- **Green Infrastructure:** They urge that future policy on the urban greening factor should be based on a review of its effectiveness⁵⁹. They welcome moves to identify areas deficient in open space access and note that inaccessible spaces like railway embankments can still be important green corridors for wildlife.
- **Waterways:** They call for the Thames Strategy Partnership to be "hugely strengthened" to protect the Thames and its tributaries. They highlight the "serious failure" of boroughs east of Chelsea to define Thames Policy Areas as required by the 2021 London Plan.
- **Flood Risk:** They support strengthening the requirement for Greenfield Run-Off Rates and a new requirement to use sustainable drainage systems (SUDS) even in small developments, such as when front gardens are paved for car parking.
- **Transport:** They reassert that growth must be directly associated with transport improvements. The lack of funding in the 2025 Spending Review means the future of several Opportunity Areas needs a "major reality test". They believe there is a need for stronger measures to minimise car use, such as additional charges for large cars in parking bays. Where major projects like Crossrail 2 or the Kensal Canalside Elizabeth Line station are not realised, dependent Opportunity Areas must be reassessed.
- **Fire Safety:** They agree the Plan should clarify how fire safety policies should be applied, but note this ultimately needs to be addressed at a national level.