

RESPONSE TO Chapter 1, draft London Plan

We note that the GLA survey/questionnaire which accompanies the consultation begins at Chapter 2, and provides no space for comment on Chapter 1. The overall ambition and the Good Growth objectives are not policies, so tests of soundness do not easily apply. Nevertheless, the ambition and objectives need to be justified. Despite claims of continuity, they are inconsistent with the justifications provided in the current LP with regard to issues set out in current LP GG1, and no evidence or argument is presented to explain or justify this. Similar problems apply to the 'Plan's approach to addressing housing need'.

1. The Plan is unsound in that the Good Growth objectives do not meet the Mayor's continuity of ambition for good growth.

The Mayor's ambition for good growth, succinctly stated in 1.7 as "growth that drives economic productivity, is socially inclusive and environmentally sustainable", is not fully addressed by the four Good Growth objectives set out in Table 1.1. The four objectives say nothing about social inclusion or a number of related issues around creating strong and inclusive communities.

Chapter 1 of the draft new LP provides an 'Overview and Good Growth Objectives'. There are four objectives (with sub-objectives) which "individually and collectively contribute to delivering Good Growth". The draft LP claims a continuity of ambition for good growth from the current LP: "The Mayor's ambition for Good Growth... continues to underpin the Plan" (1.7)

But the current LP has six objectives, whereas the draft LP has just four. Current LP GG3 'Creating a Healthy City' and GG6 'Increasing Efficiency and Resilience' have been absorbed into the fourth objective in the draft LP "Creating a greener, resilient and healthy city'. But the first good growth policy of the current LP GG1 'Building strong and inclusive communities", has been excised.

The current LP GG1 'Building strong and inclusive communities' requires "*those involved in planning and development must*"¹ deliver 8 sub-objectives including "(A) encourage early and inclusive engagement with stakeholders, including local communities... (C) provide access to good quality community spaces, services, amenities and infrastructure that accommodate and encourage and strengthen communities, increasing active participation and social integration... (D) ...a fairer, more inclusive and equal city". The final sub-objective is an all-encompassing ambition:

"(H) support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation".

The supporting text in the current LP explains that

¹ Our emphasis

“London is made up of diverse communities... Londoners come together to give the city its cultural character and create its future. Planning for Good Growth means planning with these communities – both existing and new – making new connections and eroding inequalities.

“London is one of the most diverse cities in the world, a place where everyone is welcome... . This diversity is essential to the success of London’s communities. To maintain this London must remain open, inclusive and allow everyone to share in and contribute towards the city’s success...

“Early engagement with local people leads to better planning proposals, with Neighbourhood Plans providing a particularly good opportunity for communities to shape growth in their areas. Taking advantage of the knowledge and experience of local people will help to shape London’s growth, creating a thriving city that works better for all Londoners.”

There is no explanation in the draft LP of the excision of GG1 and the overarching ambitions expressed in it. No analysis of the impact of the current LP on fostering strong and inclusive communities is presented. In fact there is no analysis provided in the text of how well any of the six Good Growth policies have performed in framing the spatial development plan in the current LP, or how their ambitions have been achieved over the past five years, whether the 102 policies in the current LP have addressed these GG objectives, and whether these objectives need to be reconsidered – and whether it’s appropriate to drop the very first Good Growth objective set out in the current LP.

Furthermore, there is no explanation in the draft LP of why this is the overall ambition and from whence the four remaining objectives derive, other than the proposals that this is a ‘continuity’ with the current LP ambition and objectives. The current LP is explicit that the overall ambition is to reduce inequalities and strengthen communities:

“This London Plan takes a new approach. It plans for growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit... Planning for mixed use developments in all parts of London will spread the success of London’s economy and create stronger communities where everyone feels welcome.” (1.0.9-10)

When questioned about this at the event launching the draft in July, the LP team said that the principles of GG1 are shot through the entire plan. A simple word search reveals that this is not the case: nowhere in the draft LP is there any reference to inclusive engagement or inclusive growth; diversity is mentioned twice with regard to housing mix and to town centre functions; inclusive communities are mentioned once with regard to housing size mix in HN7 – by contrast, the current LP refers to diversity on 24 occasions.

Furthermore, there is a lack of meaningful consultation, democratic accountability and community voice. The draft LP reads as developer-framed language and conceptual framework, and pays lip service to consultation: the term “consultation” appears just 13 times, predominantly referring to internal GLA/TfL/borough dialogue rather than community engagement! To ensure that the Plan is effective and justified, it should respond to needs and contribute to Sustainable Development. This requires a plan-making process, and the objectives and policies that follow, to be framed around

legitimacy, democratic processes and continuous community involvement (not one-off consultations).

There is a lack of review of equalities impacts across the existing London Plan period. This is crucial to test the effectiveness of existing policies before deciding how to proceed. Without this step, the draft London Plan lacks a coherent evidence base or strategy.

The Equality Impact Assessment in the Integrated Impact Assessment (IIA) is superficial and skewed towards positives, such that it fails to meet the Public Sector Equality Duty (s.149 Equality Act 2010). The existing IIA simply fails to assess negative impacts or cumulative impacts.

The removal of GG1 'Building Inclusive Communities' leads to a failure to embed meaningful equalities requirements across multiple policies, and detailed amendments to multiple policies are required (in areas covering housing, small/independent business protection, cultural/creative space, open space, accessible housing, public realm, transport). For example, strengthening affordable housing policy to link housing affordability to borough median income and need; protect small/independent businesses, markets and cultural heritage; and requiring accessible design and enforcement rather than relying on the "should" wording.

CHANGES REQUIRED

Insert or restore a top-line **Good Growth Policy** * and publish the mayoral equivalent of a Statement of Community Involvement explicitly requiring:

- A commitment to inclusive communities, equalities, and diversity with the necessary place-making that delivers on this; a fairer and caring² city.
- Early and continuous community involvement / coproduction and democratic accountability mechanisms across plan-making and development decisions.
- Transparent, published monitoring (annual) on growth areas and Opportunity Areas (homes, jobs, health, deprivation) and cumulative impacts.
- Clear enforcement mechanisms (change "should" to "must" where outcomes are essential) and post approval compliance checks.
- * Note: that this should be a Policy and not an Objective in order that it sets the overall ambition for the Plan, one that is recognised and acted on.
- **Suggested wording**
"To achieve sustainable development that meets the needs of communities now and for future generations, and to reduce inequalities, those involved in planning and development must: encourage early and inclusive engagement with stakeholders, including local communities; provide access to good-quality community spaces, services, amenities and infrastructure; ensure that London generates a wide range of opportunities from which everyone can benefit; and create a city in which all Londoners can move around with ease, confidence, independence, choice and dignity."

² See 'Alternative London Plan for a caring city', in particular Policies 1 to 5 & Policy 7, Just Space 2026

- “The Mayor shall publish the equivalent of a Statement of Community Involvement setting out how communities will be engaged in plan-making, Opportunity Area Planning Frameworks, supplementary planning documents and major planning applications. Engagement shall be continuous and co-productive, not a one-off consultation.”

2. The Plan’s approach to addressing housing need as set out in chapter 1 is unsound.

Firstly, there is no analysis of the current problems nor of the failure of existing LP policies to resolve the problems of housing need. The problems are experienced in relation to affordability: housing is too expensive to buy for households on an average income without huge savings; rents are unaffordable, reaching 50% of average income in large parts of London; and for those households with low incomes there is a huge shortfall of genuinely affordable housing, particularly of family-sized affordable homes.

Secondly, it is not self-evident that this unaffordability is simply or primarily the result of a shortage of housing in general. London does not need more unaffordable housing. None of these problems would be resolved by an approach which simply builds more homes. Even the OBR concurs that building more market housing, even on the scale the government seeks (1.5m over five years) would bring down house prices by 0.8%. Lambeth has produced around 26,000 homes since 2006, around a 20% increase of their stock, while Lambeth’s population has increased by around 17%. Centre for London has produced evidence that

“When examined in terms of the homes the city has relative to the people who need them, London had roughly the same number of homes per 1,000 population in 2024 as in 2002. There are also around 10% more homes per household than twenty years ago... Average floorspace per person rose by almost 30% between 2004 and 2023. But this additional floorspace accrued disproportionately to higher-income owner occupiers. This means that, despite London having more housing available for use per person than twenty years ago, housing inequality has widened rather than narrowed.”³

The increasing unaffordability of housing to purchase or rent cannot therefore be the result of not producing enough general housing; the evidence would suggest that we have not produced enough housing of the right size and mix and tenure. The SHMA’s evidence is that the housing need is more complex than sheer numbers of units: “the need for family-sized affordable housing is acute. Within the low-cost rent sector, there is a critical requirement for homes of 3 bedrooms and larger to address severe overcrowding and rehouse families currently in unsuitable temporary accommodation”.⁴

The SHMA concludes that even if London were to continue on its current trend of delivering around 22,000 homes per year, we would need “approximately 15,400 low-cost rented homes per year (accounting for 68% of the total need), driven by the backlog of homeless households that must be addressed regardless of future growth trends.”⁵ At the other end, if London were to deliver an

³ Delivering the Homes London Needs, Centre for London 2026, Summary

⁴ Ibid, 6

⁵ SHMA Table 2, para 14

unprecedented 89,000 homes p.a. “affordable housing accounts for 51% of total need. The combined requirement for low-cost rent and intermediate tenures is approximately 45,500 homes per year.”⁶ This would require significant increases in public investment⁷. As the draft LP acknowledges, “While the Mayor has secured up to £11.7bn in grant funding 2026-36 this is still insufficient to meet the scale of the housing delivery required”⁸, let alone the necessary investment in additional transport infrastructure. It has been recently reported that the initial tranche of grant aid to social housing providers, some £6bn, has been oversubscribed by three times, demonstrating their recognition of need for homes that meet the real needs of Londoners⁹.

The SHLAA shows that during the 10-year period from 2027/28 to 2036/37 there is a developable housing capacity of only c.558,450 homes across London; and the SHMA Addendum evidences that 367,450 (66%) of these need to be affordable, of which 238,430 (43%) need to be low-cost rent homes.¹⁰

Since two thirds of the homes London needs are affordable (even in the incredibly ambitious proposal that 55,800 new homes are delivered each year), simply setting an overall target for housing – regardless of affordability or tenure – is not going to address London’s housing need.

Thirdly, achieving additional genuinely affordable housing through general housing growth has been an aspiration since at least the first London Plan 2004. That plan focused much of the growth on the 28 Opportunity Areas, but this proved insufficient, so the list of OAs was expanded firstly in LP 2011, then in 2016 (the FALP) to include highly accessible town centres also identified as suitable for significant growth, and further still in the LP 2021. A strategic target of 50% of all new homes to be affordable was also set.

How has this approach fared over 22 years? By any measure it has failed. Homelessness, temporary accommodation, overcrowding have all increased. The amount of money spent by the boroughs on Temporary Accommodation is bankrupting them. House prices and rents have far outpaced incomes; purchasing and renting homes have become increasingly unaffordable. Families unable to afford living in London have moved out and school rolls have crashed. Household formation has been significantly constrained, contributing to rapidly falling birth rates. And at the same time, we have 100,000 empty homes, and many more under-occupied as people use property as a safe place to store wealth, many in new builds. Developers are reporting a glut of one and two bed in areas like Vauxhall, leading not to lower prices but to slower absorption rates (a sign if ever one was needed that the housing market pricing mechanism does not work), starts and completions have slowed, and we have over 250,000 homes approved but unbuilt.

⁶ SHMA, 4

⁷ SHMA, 17

⁸ Draft LP 1.22

⁹ [GLA writes to bidders confirming £6bn worth of grant allocations, with programme reportedly three-times oversubscribed | News | Housing Today](#), Seen 7/10/2026

¹⁰ Referenced in the update to the draft LP on 1/09/26

To continue with this approach – setting an unachievable target unanchored in need or affordability and tailoring other key planning policies to serve that end (such as industrial land release) – is not only unsound, it is wholly irrational.

Nevertheless, even as we expect ever smaller proportions of the affordable housing which is the over-riding need (as a result of the ‘emergency measures’ as well as issues affecting viability) the draft London Plan not only irrationally continues with the approach, it doubles down on it, proposing a series of highly damaging strategic planning policies in an attempt to unlock delivery, but without any analysis of why delivery has consistently failed to provide the affordable homes that London needs or market homes which Londoners can afford to rent or buy. It proposes densification wherever development opportunities arise. It introduces an Optimisation Framework based on a crude typology of London and access to public transport and services etc, with no consideration of the patterns of demography and deprivation. It proposes the highly problematic release of industrial land and Green Belt, and the introduction of a ‘step change in the approach to small sites’ without publishing the step-change until late in the consultation.

Further on, in the opening chapter that sets the overall ambition and objectives, it admits the centrality of delivering affordable housing:

“The delivery of affordable housing is not only essential to meet Londoners’ needs, but also to support housing delivery overall given its role in reducing exposure to absorption rate issues (i.e. how quickly homes can be sold in a market) which act as a significant limitation on the volume and speed of market housing delivery. Given the scale of housing need, significant increases in funding for affordable housing grant must be made available to bolster supply in both the 10 year and longer-term period.”¹¹

To sum up, the Plan’s approach to addressing housing need should be one that priorities and sets targets for genuinely affordable housing, particularly social rent, based on evidenced need; and market housing is one of a range of mechanisms for meeting need. To do otherwise results in a proposed Plan that neither contributes to sustainable development or is positively prepared, effective and justified.

CHANGES REQUIRED

Replace the undifferentiated 558,000-home target with a needs-based target that prioritises social rent and other genuinely affordable housing. The target should be measured in Net Internal Area and derived from the SHMA; market housing should be treated as one possible means of supporting delivery, not as the objective. Define social rent as social infrastructure, prioritise refurbishment over demolition, support community-led housing and publish the evidence for the proposed “step change” on small sites before consultation closes¹².

¹¹ 1.22

¹² See ‘Alternative London Plan for a caring city’, in particular Policies 10 to 16 & 19 to 24, Just Space 2026

Suggested wording

“The Plan shall set a target for social-rent housing, measured in Net Internal Area, based on the Strategic Housing Market Assessment. Social-rent housing at target rents shall be defined as social infrastructure and prioritised in all plans and decisions.”

3. Contradiction between the Good Growth objectives and the Plan’s approach to housing need.

Despite the excision of the previous GG1 Building strong and inclusive communities, the remaining Good Growth are in themselves laudable. However, the target of new homes is double the average annually delivered since 2008, and as a result of this the Plan is calling for a level of densification previously unseen, as well as release of industrial land and Green Belt. There is a tension between these GG objectives, and this ‘approach to housing need’ comes at a price: for example, the release of industrial land for housing potentially prioritises ‘Delivering the homes and neighbourhoods Londoners need’ over ‘Growing London’s economy in a way that benefits all’. The Plan’s approach to housing need is driving the ‘Delivery of new homes’ objective over the protection and growth of economic activity to the detriment of the achievement of sustainable development and a positively prepared, effective and justified Plan.

CHANGES REQUIRED

The Plan must state how conflicts between objectives will be resolved. Social rent, economic diversity, community infrastructure and environmental limits should take precedence over speculative market delivery. A polycentric city with Lifetime Neighbourhoods offers a coherent alternative: it supports local economies, reduces the need to travel, protects industrial capacity and promotes the provision of facilities for a more cohesive and sustainable London. Maximum density safeguards should replace crude optimisation, and there should be no net loss of industrial land.¹³

4. Additional Points

a) Define “Londoners”

The draft Plan repeatedly promises benefits for “Londoners” but does not define who is included. That allows an apparently universal claim to conceal unequal effects. Chapter 1 and every Mayoral strategy should define Londoners inclusively, including migrants and undocumented residents, people in precarious work, low-income households, disabled people, carers, time-poor workers, people with intersecting identities and people displaced by housing costs. This is necessary if “a fairer, greener London for everyone”¹⁴ is to be more than an aspiration and if the Public Sector Equality Duty is to be met in substance.

¹³ See ‘Alternative London Plan for a caring city’, in particular Policies 26 to 29, Just Space 2026

¹⁴ Mayor’s Foreword, draft London Plan 2026

CHANGE REQUIRED

Insert an inclusive definition and require policies, assessments and monitoring to identify who benefits, who bears costs and who is excluded.

b) Define the best use of land

The Plan uses “optimise” and “best use” without defining the public value to be achieved. Transport accessibility and financial viability are insufficient measures: they can legitimise over-development, loss of community spaces and schemes that disregard local character, infrastructure and environmental limits.

Suggested wording

“Best use of land shall be measured in terms of social, economic and environmental value, not only financial viability, to accord with the achievement of sustainable development. Plans and decisions shall prioritise Lifetime Neighbourhoods, protect existing uses that meet local community needs and apply maximum density limits.”¹⁵

c) Elaborate more on health and resilience.

Add Just Transition and recognize food as infrastructure.

Absorbing “Creating a Healthy City” and “Increasing Efficiency and Resilience” into a single environmental objective weakens both. Health inequalities arise from living conditions, access to education, employment, housing, the community environment and not just the natural environment, air quality, access to green space. Resilience includes social infrastructure, community capacity and economic diversity as well as tackling climate change.

The environmental objective does not connect climate action with poverty, unequal exposure to harm or democratic control. It omits embodied carbon limits, retrofit-first, fuel poverty, public and community energy and consumption-based emissions.

Food is absent as a strategic infrastructure issue. This overlooks the role of healthy-food access, food growing etc in addressing health inequalities.

CHANGE REQUIRED

Incorporate the elaborations and additions above.

Suggested wording

In addition to the elaborations and additions above:

¹⁵ See ‘Alternative London Plan for a caring city’, in particular Policies 9 and 26, Just Space 2026

“The Plan shall adopt a just transition approach that tackles social inequality and the climate and nature emergency together. It shall require embodied-carbon limits, retrofit-first, public and community energy, biodiversity net gain without exemptions, floodplain protection, compliance with World Health Organization air-quality guidelines by 2030 and a diesel-free London by 2030.”¹⁶

Conclusion

This analysis of good growth, housing need and conflicting objectives demonstrates serious deficiencies, and articulates a positive alternative. The required approach is a caring, polycentric city based on, among other things, co-production, social rent, Lifetime Neighbourhoods, economic diversity and a just transition. The Mayor should revise Chapter 1 accordingly and consult Londoners directly on the revised framework.

Presently the Plan has not been positively prepared – does not meet evidenced need, is not justified – is not credibly explained, not effective – has absent or inadequate delivery mechanisms, and is not consistent with national policy and statutory duties - the Plan’s sustainable development claims are not reconciled with equalities, climate, nature and deliverability requirements.

¹⁶ See ‘Alternative London Plan for a caring city’, in particular Policies 13, 16, 31 to 39, Just Space 2026