THE LONDON SCHOOL OF ECONOMICS AND POLITICAL SCIENCE

Sadiq Khan, Mayor of London
Draft London Plan
London Plan Team, Planning & Regeneration
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Dear Mayor of London,

Consultation on Draft London Plan 2026

Thank you very much for the invitation to respond to the consultation on the Draft London Plan, which is a major strategic initiative, on matters of very great concern to all with stakes in London life and in assisting effective ways in which the city's dynamism can been enabled in socially and environmentally sustainable ways in the face if great challenges.

We are both professors with urban and regional development expertise and several decades of engagement with these issues in a London context, including work with and for LPAC, the GLA, City of London and others, including groups of boroughs.

Despite this breadth of informed concern about most aspects of the Draft Plan (and its predecessors) our response here focuses entirely on the Housing chapter, and issues of strategic feasibility and preparedness that stretch across many aspects of that. These include a couple of established themes involving serious Green Belt reform and interaction/collaboration across the extended labour market region. But also basic concerns about the strategic planning process – including critical engagement with how and why planned outcomes in the city-regional housing market neither get met nor productively explained.

In our judgement the Draft New London Plan fails overall in terms of *soundness*, because a clear and striking failure in the field of housing supply means it must also fail in terms of the economy and employment. Because of the importance of housing supply and cost, via its impacts on labour supply, for sustaining and advancing London's role as a growth hub for the UK economy in challenging times.

Within the areas of housing supply covered by chapter 3 of the Draft Plan we see clear failings in relation to all four tests - of positivity of preparation, justification, effectiveness and conformity to national policy. More specifically: in terms of: *preparation*, even for the first decade; *justificatio*n, in considering alternatives, fall-back positions or using hard evidence; *likely effectiveness* in relation to deliverability or joint working; and *consistency with national policy* in assured capacity to meet targets.

Across this set of shortcomings we are aware of detailed evidence and argument that will be supplied by other objectors with close practical engagement in the field. Standing back from that to look more widely, we have grave reservations with respect to the array of actual and anticipated obstacles to delivery of adequate housing supply. This failure will not only have serious

and profound direct consequences for the welfare of Londoners but also for the supply of labour, damaging London's prosperity.

Our emphasis is on the embedded failures of this London Plan, as of its predecessors, *at the strategic level* - particularly in terms of the failure to recognise and constructively address questions about securing the necessary and intended outcomes. This failure is not just with respect to GLA focussed policies but in coming to terms with/offering polices to address the reality that London's housing and labour markets extend across the whole of the metropolitan region and indeed the Wider South East.

This is clearly key for the GLA, which is specifically identified as being a strategic authority. But, as with Plans from the last 15 years, this Draft displays a remarkable inattention to the strategic level. The plan is neither actively seeking to learn why there have been, and continue to be, gaps between declared intentions on the one hand and obligations and outcomes on the other, nor remedy these The impression is rather one of ignoring reasons why past policies have failed, and the long term strategic consequences of that failure. In previous Inquires Inspectors have made fruitful suggestions to the GLA that it should look beyond its current policy to strategically consider Green Belt reform and engage positively with counterpart authorities. These steers have not just been ignored but have vanished from the current Draft. *For a strategic authority to fail so abjectly seems to require rejecting the current draft and demanding a more realistic and thoughtful plan for the future.*

Our full response to the Consultation is appended

Yours Sincerely



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