

Response to draft London Plan consultation by London Forum

The GLA's consultation on the draft London Plan 2026 closed on 15 October 2026. The London Forum has submitted a 39-page response. This page is the short version: the main points, then a one- or two-line summary of our comment on each policy, with links to the GLA's policy text and to our full comment. [Read the full response.](#)

Why the draft Plan falls short

We agree strongly that the Government's 85,000-a-year target for new homes is unrealistic and that a lower target is needed. But the draft Plan is built on housing evidence that does not stand up to analysis, and on growth that depends on infrastructure nobody has committed to provide. In our analysis it risks failing the NPPF soundness test.

- **The housing target doesn't stand up.** Projections made ten years ago for 2024 were more than 550,000 above the ONS's own estimate. The housing-need assessment was hastily amended to fit the 558,000 target, and rests on an assumption that household formation should return to 2001 levels, with no evidence given.
Ask: What evidence is there that 558,000 homes is a sound target, or the right mix of homes?
- **The wrong homes, and too few for those in greatest need.** The Plan's evidence steers 55–65% of new homes to one-bedroom units and finds no need for new market family homes. The 50% affordable target is far too low, and the real crisis is among renters needing social rent.
Ask: Why is a Plan for London planning so few family homes and so little low-cost rent?
- **Growth without the infrastructure to support it.** The Opportunity Areas must deliver over 400,000 homes, many depending on transport schemes with no committed funding. Outside Annex F the Plan makes no reference to public service infrastructure, and the Transport Strategy dates from 2018.
Ask: Which of the transport and public service investments the Plan relies on are funded?
- **Green Belt and industrial land are being given up first.** The Plan does not require a clear, evidenced demonstration that brownfield and under-used land have been fully considered before Green Belt is released. It also releases industrial land for housing while another policy aims to protect it, and nothing explains how the two are reconciled.
Ask: Why release Green Belt and industrial land before alternatives have been exhausted?
- **The Thames is missing from the Plan.** Thames Policy Areas appear only in one policy and are ignored in the spatial strategy, tall buildings, heritage and views policies. Tall buildings could go almost anywhere, making local-plan locations pointless.
Ask: Where is the Plan's vision for the Thames, and what is the point of identifying locations for tall buildings if they can be built anywhere?
- **Protections that Londoners rely on have been weakened or dropped.** Basements, single-aspect homes, minimum ceiling height, heritage protections, community cultural space and green-space standards are all watered down or missing, while construction

quality enforcement is not addressed at all.

Ask: Why are these protections being cut, and who will inspect what actually gets built?

Our comments, policy by policy

Each entry shows whether we support, support with changes, or object, with a link to the GLA's policy text and to our full comment in the PDF (opens at the right page on a desktop or laptop). Of the 52 policies below, 8 are objections, 22 support with changes, 20 support and 2 no comment.

Jump to: [Overview and housing evidence](#) | [Chapter 2 · Making best use of land](#) | [Chapter 3 · Housing](#) | [Chapter 4 · London's economy](#) | [Chapter 5 · Green, healthy, resilient](#) | [Chapter 6 · Place visions and approaches](#) | [Annexes and drafting](#)

Overview and housing evidence

- [Overview and Good Growth Objectives](#)

Agrees the Government's 85,000-a-year target is unrealistic, but even 55,800 a year depends on transport investment nobody has committed, and on Green Belt release. Outside Annex F the Plan has no reference at all to public service infrastructure.

Support, with changes | Our comment: [paras 1–5, pp.1–2](#)

- [The housing evidence \(Chapter 3 introduction and Appendix A\)](#)

The population projections, SHMA and Addendum, SHLAA and Viability Assessment behind the 558,000-home target are seriously flawed. The real crisis is renters and social rent, not market sale.

Objection | Our comment: [paras 42–47, p.10](#) · [Appendix A, pp.31–36](#)

Chapter 2 · Making best use of land (MBUL1–10)

- [MBUL1 Spatial Strategy](#)

Backs the push for transport and connectivity, but wants Green Belt release justified only after brownfield options are exhausted, Clause A.5 (affordable-housing exceptions in early phases) deleted, the 800m-from-stations principle restored, and the Thames made a strategic element.

Support, with changes | Our comment: [paras 6–12, pp.2–3](#)

- [MBUL2 Optimising Land Use](#)

Supports higher minimum densities, but the Optimisation Framework is hard to use, leans on an unclear Sustainable Access Measure, and sets no clear maximums. Wants sensitivity and heritage built in, basement protection (old Policy D10) restored, and land assembly tackled.

Support, with changes | Our comment: [paras 13–22, pp.3–6](#)

- [MBUL3 Tall Buildings](#)

Entrenches the Master Brewer problem: tall buildings could go almost anywhere, making local-plan locations pointless. Delete Development Management clauses A.3 and B, and allow buildings over 20m near the Thames only in the most exceptional circumstances.

Objection | Our comment: [paras 23–26, pp.6–7](#)

- [MBUL4 Utilities](#)

Supports the policy; wants engagement with utility providers written into the policy itself, and the August 2026 MHCLG proposals on Mayoral powers covered.

Support | Our comment: [paras 27–28, p.7](#)

- [MBUL5 Sustainable Transport](#)

No overall strategic view as the NPPF requires, and no measures to reach the 80% sustainable-travel target. The 2018 Transport Strategy is out of date: a new one must follow rapidly if it can't be ready before submission.

Objection | Our comment: [paras 29–31, pp.7–8](#)

- [MBUL6 High-Quality Design](#)

Strongly supports design codes and design review. Wants the implementation points moved into the policy, and third-party inspection at key construction stages to tackle poor build quality.

Support, with changes | Our comment: [paras 32–34, p.8](#)

- [MBUL7 London's Heritage](#)

Accepts the consolidation, but the London-specific protections in current Policy HC1C (cumulative impact, early heritage input) should be reinstated. Notes the omission of London's major cemeteries and the damage to the Thames setting.

Support, with changes | Our comment: [paras 35–37, pp.8–9](#)

- [MBUL8 Inclusive Design](#)

Supports the policy and the evacuation-lift requirement; Clause B3 should be amplified using wording from para 2.108.

Support | Our comment: [para 38, p.9](#)

- [MBUL9 Healthy Streets and Public Realm](#)

Supports in general, but asks why there are no plan-making policies for local Healthy Streets approaches (including kerbside greening), and questions a blanket ban on crossovers that would hit freight and servicing.

Support | Our comment: [paras 39–40, p.9](#)

- [MBUL10 Security and Safety](#)

Supports the policy; it should reference NPPF Policy P5b on developments where large crowds gather.

Support | Our comment: [para 41, p.9](#)

Chapter 3 · Housing (HN1–10)

- [HN1 Increasing London's Housing Stock](#)

Supports brownfield-first, but borough targets come from a flawed SHLAA. They need rigorous review, boroughs shouldn't be penalised for missing them, and HMOs deserve a role.

Support, with changes | Our comment: [paras 48–51, p.11](#)

- [HN2 Protecting and Reshaping Housing](#)

Supports protecting the stock. Targets should be “net additional homes”, and loss of housing should be resisted unless repair and refurbishment have been fully considered.

Support, with changes | Our comment: [paras 52–53, pp.11–12](#)

- [HN3 Delivering Affordable Housing](#)

The 50% affordable target is far too low and the threshold approach won't even deliver it. Low-cost rent targets must rise significantly, the method behind the bands and thresholds must be published, and early-stage review clarified.

Objection | Our comment: [paras 54–59, p.12](#)

- [HN4 Gypsy and Traveller Accommodation](#)

Supports the policy, but Table 3.4 adds past and future need together: doubling the five-year figure gives 354 pitches, not 876. The figures need review.

Support, with changes | Our comment: [para 60, p.13](#)

- [HN5 Managing Specialist Accommodation](#)

Does not accept the 31.5k student-bedspace target or its distribution: demand is over-estimated and concentrations should be avoided. Changes to older persons' housing targets need to be made much clearer.

Objection | Our comment: [paras 61–66, pp.13–14](#)

- [HN6 Build to Rent](#)

Supports the policy.

Support | Our comment: [para 67, p.14](#)

- [HN7 Housing Size Mix](#)

The “single housing market” claim is misleading, and the evidence behind 55–65% one-bed homes (and no need for new market family homes) is flawed. Clause B should rely on Local Housing Needs Assessments instead.

Objection | Our comment: [paras 68–75, pp.14–16](#)

- [HN8 Housing Design](#)

Welcomes openable windows and lifetime-cost thinking, but objects to the weakened rule on single-aspect homes and the cut in minimum ceiling height from 2.5m to 2.4m. Wants modelling of the combined effect of the design requirements.

Support, with changes | Our comment: [paras 76–79, p.16](#)

- [HN9 Accessible Housing](#)

Strongly welcomes the firmer requirements; the sound-transmission and noise recommendations (paras 3.117–3.118) should be part of the policy.

Support | Our comment: [paras 80–81, p.16](#)

- [HN10 Burial Space](#)

No comment on the policy itself, but it doesn't belong in the housing chapter.

No comment | Our comment: [para 82, p.16](#)

Chapter 4 · London's economy (GLE1–13)

- [GLE1 Employment Space](#)

Supports the policy, including Article 4 Directions to remove permitted development rights for commercial-to-residential conversion.

Support | Our comment: [para 84, p.17](#)

- [GLE2 Supply of Industrial Land](#)

Supports intensification and boundary reviews, but notes the unresolved clash with PV5 (industrial land released for housing), no mechanism for cross-borough re-provision, and a need to avoid net loss of industrial space.

Support, with changes | Our comment: [paras 85–87, p.17](#)

- [GLE3 Data Centres](#)

Clause D backs data centres in suitable locations, but Clause E then sets rules for “other” locations, which logically means unsuitable ones. Must be amended.

Support, with changes | Our comment: [paras 88–89, pp.17–18](#)

- [GLE4 Night-Time Economy](#)

Wants the policy to distinguish evening from small-hours impacts, no blanket 24-hour operation, the two-way agent of change principle added, and a community-value test for new pubs (Clause C).

Support, with changes | Our comment: [paras 90–94, p.18](#)

- [GLE5 Culture and Creative Industries](#)

Supports in general, but support for community-group cultural space (old Policy HC5) has been dropped and must be restored; neighbours need agent-of-change protection from meanwhile uses.

Support, with changes | Our comment: [paras 95–96, pp.18–19](#)

- [GLE6 Visitor Infrastructure](#)

Supports, including resistance to short-term lets, but asks how boroughs will deliver enhancements and why convention centres are no longer mentioned.

Support | Our comment: [para 97, p.19](#)

- [GLE7 Affordable Workspace](#)

Supports the policy; boroughs should plan proactively for hubs of affordable workspace, not piecemeal.

Support | Our comment: [para 98, p.19](#)

- [GLE8 Employment and Skills](#)

Supports the policy.

Support | Our comment: [para 99, p.19](#)

- [GLE9 Aviation](#)

Broadly supports. The claim that London’s airports operate as a single system is false, equal treatment of airports (old Policy T8) should stay, and Clause D on helicopters needs to say what it means.

Support, with changes | Our comment: [paras 100–103, pp.19–20](#)

- [GLE10 Safeguarded Wharves](#)

Strongly supports more freight on the Thames, but the 11m-tonne capacity is below forecast demand, 24/7 wharf operation is impracticable in west London, and canals are ignored.

Support, with changes | Our comment: [paras 104–106, p.20](#)

- [GLE11 Circular Economy](#)

No requirement for boroughs to include circular-economy principles in local plans, and the policy covers only construction waste, not recycling more generally.

Support, with changes | Our comment: [paras 107–108, p.20](#)

- [GLE12 Waste](#)

Supports in general; circular-economy requirements are weaker than today, and boroughs should be encouraged to work with supermarkets on recycling non-rigid plastics.

Support | Our comment: [paras 109–110, p.20](#)

- [GLE13 Aggregates and Mineral Resources](#)

No comment: in line with the NPPF.

No comment | Our comment: [para 111, p.20](#)

Chapter 5 · Green, healthy, resilient (GHR1–11)

- [GHR1 Energy Efficiency](#)

Supports the policy, but nothing explains what happens if five years of in-use energy data show a building is failing.

Support | Our comment: [para 113, p.21](#)

- [GHR2 Low-Cost, Low-Carbon Heat](#)

Supports the policy, including heat network zones.

Support | Our comment: [para 114, p.21](#)

- [GHR3 Whole-Life-Cycle Carbon](#)

Supports; the wording of para 5.32 on weighing retention against new build should be added to the policy.

Support | Our comment: [para 115, p.21](#)

- [GHR4 Heat Risk](#)

Welcomes the significant strengthening of current Policy SI4.

Support | Our comment: [para 116, p.21](#)

- [GHR5 Flood Risk and Drainage](#)

Welcomes the strengthening; Clause A.1 should refer to flood plains and wetlands.

Support | Our comment: [para 117, p.21](#)

- [GHR6 Trees, Biodiversity and Geodiversity](#)

Supports, but regrets the loss of current Policy G8 on food growing and allotments, which should be retained.

Support, with changes | Our comment: [para 118, p.21](#)

- [GHR7 Green Infrastructure and Urban Greening Factor](#)

Supports the policy.

Support | Our comment: [para 119, p.22](#)

- [GHR8 Accessible Green Space](#)

Strongly opposes Clause A.2, which would let boroughs set standards below Natural England's Green Infrastructure Framework. Also wants protection from over-use by commercial events, and long-term funding for green space.

Objection | Our comment: [paras 120–122, p.22](#)

- [GHR9 Clean and Healthy Waterways](#)

Supports, with one strong exception: Thames Policy Areas are required here but absent from the main design and heritage policies, and there are no joint Thames strategies east of Chelsea. Also nothing on sewage downstream of Mogden, or canal freight.

Support, with changes | Our comment: [paras 123–127, p.22](#)

- [GHR10 Air Quality](#)

Welcomes the focus, but the Plan may not meet NPPF Policy P1 on other kinds of pollution.

Support | Our comment: [para 128, p.23](#)

- [GHR11 Cycle and Car Parking](#)

Welcomes needs-based cycle parking, but borough banding is arbitrary (SAM would be better), hire bikes need provision, and car-parking cuts worry us where connectivity is still poor.

Support, with changes | Our comment: [paras 129–133, p.23](#)

Chapter 6 · Place visions and approaches (PV1–8)

- [PV1 Brownfield First Opportunity Areas](#)

Supports, but there has been no review of progress in any Opportunity Area, many designated over 20 years ago. The Annex E sketches are inadequate; review them all urgently.

Support, with changes | Our comment: [para 135, p.24](#)

- [PV2 Central Activities Zone](#)

Supports use of Article 4 Directions. Restore the reference to residents, add agent of change and cross-references, require a viability assessment for office redevelopment, and explain the five “transformational gateways”.

Support, with changes | Our comment: [paras 136–139, p.24](#)

- [PV3 Town Centres and High Streets](#)

Supports; protect existing upper-floor business space, tighten the bar on retail outside town centres, and write the partnership approach into the policy.

Support | Our comment: [paras 140–145, p.25](#)

- [PV4 Strategic Economic Clusters and Corridors](#)

Supports, but notes little evidence of successful mixed-use housing in clusters, and severe land constraints.

Support | Our comment: [para 146, p.25](#)

- [PV5 Industrial Land Supporting Housing Growth](#)

Cannot support: the housing targets behind it are unsound, and it conflicts with GLE2's aim to protect industrial land.

Objection | Our comment: [para 147, p.25](#)

- [PV6 Metropolitan Open Land](#)

Welcomes the strengthened policy; it should state clearly that MOL is not Green Belt. Questions Clause G.2's wording on extensions.

Support, with changes | Our comment: [paras 148–149, p.26](#)

- [PV7 Sustainable Development and Enhancement of the Green Belt](#)

Cannot support in its current form: the targets are unsound, the assumptions over-optimistic, there is no vision for the Green Belt, and the Green Belt study should be re-run against the new policies before submission.

Objection | Our comment: [paras 150–152, p.26](#)

- [PV8 Strategic and Local Views](#)

Welcomes the new views and protection for the background of views, but no strategic views west of Lambeth Bridge are designated, the old view categories were dropped, and the Thames Policy Area gap remains.

Support, with changes | Our comment: [paras 153–157, pp.26–27](#)

Annexes and drafting (Annexes A–G, Appendix B)

- [Annex A Key Performance Indicators](#)

Welcomes sixteen KPIs; KPI8 should cover energy efficiency of new homes. The GLA's Annual Monitoring Report for 2024-25 is still unpublished: "totally unacceptable".

Support, with changes | Our comment: [p.29](#)

- [Annex B Town Centres](#)

Welcomes the review, but boroughs don't appear to have been consulted on the changes; that must be fixed before submission.

Support, with changes | Our comment: [p.29](#)

- [Annex C Green Belt Sustainable Locations](#)

Accepts the transport lists as a starting point for analysis, but cannot support Policy PV7.

Objection | Our comment: [p.29](#)

- [Annex D Transport Interventions](#)

Dates are largely speculative, with no costs, benefits or obstacles. Not a substitute for an up-to-date, vision-based transport strategy.

Objection | Our comment: [p.29](#)

- [Annex E Brownfield Opportunity Areas](#)

The 30 areas must deliver over 400k homes but have never been systematically reviewed. Review figures, timescales and infrastructure for each.

Objection | Our comment: [p.29](#)

- [Annex F Public Service Infrastructure](#)

Nothing else in the Plan addresses this infrastructure or how its needs will be met: a fundamental omission to fix before submission.

Objection | Our comment: [p.29](#)

- [Annex G Strategic Industrial Locations](#)

Notes the list is likely to change over the next five to ten years as a result of Policy PV5.

No comment | Our comment: [p.30](#)

- Drafting, structure and typos (Appendix B)

Too little cross-referencing, footnotes without hyperlinks, undefined abbreviations, repeated misuse of “only”, a thin glossary, and a list of typos for the GLA to fix.

No comment | Our comment: [Appendix B, pp.37–39](#)