

DRAFT NEW LONDON PLAN: HOUSING

Achieving additional genuinely affordable housing through general housing growth has been an aspiration since 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 in 2011 and in 2016 (the FALP) highly accessible town centres were also identified as suitable for significant growth.

Now, with a government demanding an unachievable housing target of 880,000 homes in a decade, and the temporary accommodation crisis worsening further, the Mayor has decided that effectively all brownfield land across London is potentially appropriate for **densification**. That is the overall thrust of the new draft London Plan – and from that, a Pandora’s Box of problems arise. Some key bullet points regarding the housing and densification policies:

- The new draft LP begins with a **very high general housing figure** of delivering 558,000 homes over ten years, or 55,800 p.a. – less than the government is demanding but double anything produced in boom times, and 1,000% greater than that delivered in 2025. This target locks in a requirement for significant densification, then seeks deregulation to make this deliverable. This approach overlooks the key challenges to viability (and thence delivery) resulting from densification whilst also compromising on addressing the greatest need (for social housing) and achieving sustainability.
- The new LP is **not based on a systematic scrutiny of the outcomes of the previous London Plan 2021**. There is no analysis of the failure to meet previous housing targets; of the failure to achieve anywhere near sufficient quantities of social housing; of the right size mix, or of the increasing backlog and deepening crisis; there’s no analysis of the failure to reach net zero or reduce embodied carbon; and after over 20 years of Opportunity Area policy, there’s no analysis of the outcomes of this approach. This is the absolute opposite of evidence-based policymaking.
- **Densification immediately becomes the central goal of policy**, without any testing of its effectiveness in delivering the range of genuinely affordable housing sizes that has been identified as needed. This flies in the teeth of

SHLAA data which concludes that density negatively impacts upon viability (table 6-1). When it comes to the Integrated Impact Assessment, densification is simply presumed.

- **Housing policies expressly fail to meet the numbers of genuinely affordable homes needed** according to the SHMA, and specifically the proportion of genuinely affordable housing identified (65% of the 55,800 pa target). The strategic target¹ of 50% falls well below the percentage needed; yet there is no evidenced route to achieving the strategic target, given reductions in policy targets leaving all of them below 50% (public land is reduced to 40%, the Fast Track in outer London is reduced to 20%, and in mid-London 25%)
- **There is no evidence of testing how this will impact delivery** (both generally and in terms of AH). The evidence provided in the SHLAA is that reducing policy requirements doesn’t improve viability: *“The principal viability challenge remains the relationship between development values, construction costs, finance costs and sales absorption rates, particularly for taller development in lower value areas. As such, reducing individual policy requirements would have only a limited effect in many cases and would not fundamentally alter the current viability position across Value Bands E and F”* (SHLAA para 6.15). Yet the approach continues to push for tall buildings and more market housing, and seeks to make savings through policy requirements
- **Reductions in AH requirements**, introduced to aid viability (1) defeats the purpose of development in the first place, (2) risks exacerbating inequalities and have adverse socioeconomic effects in the most deprived areas, with growing poverty and income inequality across London (3) not most efficient approach as AH is not identified as main viability issue, and (4) AH can support delivery² e.g. through funding/finance opportunities and guaranteed early sales³; conversely, increased proportions of market housing bring delivery issues (lack of demand, absorption rates). £11.7bn in govt grant funding is severely “insufficient to meet the scale of housing delivery required”.⁴
- **Viability is not the same as profitability** – higher density development is often less viable whilst generating a larger profit. Pursuing density despite it being less viable only maintains high developer profits without a corresponding

¹ Para 3.8

² This is clearly stated at para 1.22 of the introduction

³ SHLAA, 6.13

⁴ 1.22

delivery in AH and public benefit. Furthermore, the GLA evidence base clearly shows that lower-scale development is more viable (see SHLAA table 6-1)

- **Alternatives?** Given the evidence, and assuming the Mayor's overall ambition (to simply build more homes), pursuing lower-scale development at mid-rise density, (with a focus on AH and sustainability, and supported with increased in grant funding) would be more viable and more deliverable. The Mayor rejects this approach on the grounds of opportunity cost and making the best use of land (SHLAA para 10.12). But it is the most effective way to unlock land and deliver development, whilst still ensuring sufficient supply of AH. Lower-scale mid-rise development also has better environmental and social outcomes.
- **Govt definition of affordable housing remains deeply flawed:** anything up to 80% of market rent.⁵ It should be 30% of income (net benefits). The focus of the Plan should be achieving maximum social housing.

MBUL2 – Plan making

The Optimisation Framework (OF) is fundamentally confused. Optimization is defined in the current LP "Good growth across London requires development to optimise site capacity, rather than maximising density". The OF sets out wide ranges of heights and densities for areas, depending on their accessibility and 'typology', but then declares these "*minimums should be exceeded... particularly in better-connected locations*". Setting minimums without maximums is the route to maximisation, not optimisation. The Govt's Design and Placemaking PPG guidance (referred to at 2.25) states "*Density is an output of the design process, and to incentivise efficient use of land, a design code can set minimum density standards for a given area in conjunction with requirements which specify the maximum built envelope*"

Setting *minimum* densities undermines the staged approach within the OF; it's more suitable to set maximum densities acting as envelope parameters, as in the govt guidance. The desk-based assessments to reach OF densities will never be able to fully account for design limitations on specific sites that would render denser development unsuitable – the risk is that developers use minimums to frame otherwise unacceptable development as acceptable.

The OF relies on a London Context Map which categorises all built-up areas into six typologies (e.g. 'outer suburban', 'inner urban terrace', 'large town centres'). This is

laid over a map which categorizes 'Sustainable Access Measure' (SAM, replacing PTAL), and minimum density ranges and heights are proposed for each typology, dependent upon its SAM rating. This sounds complicated, but is in fact dangerously simplistic, and can lead local authorities to inappropriate conclusions about the potential for redevelopment. The LP allows councils to complement this crudity with more detailed local 'Character Studies', but examples seen so far (such as in Lambeth and Greenwich) focus on the built environment (including heritage) but ignore the social context: demographics, deprivation, neighbourhood, community need. They should also "not seek to reduce ambition or deviate from the overall scale of ambition needed" (2.31)

Conclusion: this approach relies on assumption in favour of densification without the evidence base or analysis that this will help delivery, viability, or maintaining sufficient AH, or other objectives, including the Good Growth objectives ("Delivering the homes and neighbourhoods Londoners need" or "Creating a greener, resilient and healthy city"). These issues spill into considerations of tall buildings and mid-rise, Policy MBUL3

HN1 – Increasing London's housing stock sets the borough targets: many have gone up, some have come down; boroughs were not consulted and are piecemeal challenging them. The targets are clearly unrealistic. The policy aim is to "deliver homes that contribute toward meeting London's housing need" – but specifically don't address need directly at any level. But, alongside an unchanged viability regime, they will result in empowering developers to justify planning harms and reductions in AH and other benefits in the name of meeting targets.

Targets fail to acknowledge inability of planning system to secure *delivery*. SHLAA itself acknowledges that existing permissions account for around half of the target. And the focus on densification overlooks their own evidence base that densification presents particularly strong viability challenges that will limit delivery. There is a failure to acknowledge ecological impact of densification, in terms of increased construction and operational impacts.

HN2 – Protecting and reshaping housing is partly concerned with estate 'regeneration' projects. Part C seeks to regulate demolition and replacement of affordable housing, but lacks detail to be meaningful and measurable in practice, e.g. "robust assessment of ... alternative options". This must include a condition

⁵ In places like Vauxhall that can be over £3,000 pcm

survey and a detailed breakdown of refurbishment and infill options as part of a redevelopment audit, and includes the carbon impacts of each option, other green impacts (e.g. BNG, open space), amenity impacts (e.g. daylight and sunlight, play space), and social impacts – and in what circumstances these impacts will outweigh benefits. The requirement to “maximise the provision of additional affordable housing” is unenforceable: what would amount to the provision of affordable housing not being sufficiently maximised?

The policy also seeks to protect loss of social rent floorspace rather than the number of homes, but there should be stronger protection insisting on the same number of homes or habitable rooms. There is no analysis of the loss of secure long-term tenancies in non-council social rent. The right to return within a limited timeframe needs to be explicit. Analysis of estate regeneration across the previous LP period shows displacement and delay and a failure to return in practice: there is no assessment or acknowledgement of this and no attempt to improve in practice. There must also be some form of protection or support for non-social rent tenants displaced as a result of development.

HN3 – Delivering affordable housing requires authorities to “*maximise the delivery of genuinely affordable housing to contribute to London’s 50 per cent strategic affordable housing target*” – which is unmeasurable and meaningless in practice⁶, particularly given the more specific and lower targets elsewhere in policy.

There is a reduction in the required proportion of affordable housing in the Fast Track (20% in outer London; 25% in mid-London; only inner London retains the 35% requirement). This is unacceptable and unjustified given the GLA’s own evidence base, which identifies a growing proportionate need for AH, finding that AH costs are not the principal issue in viability, and finding that schemes with AH are often more deliverable.

Viability varies greatly within boroughs and based on site-specific constraints. Viability can also change over time. There is no assessment of the potential that we are at the bottom of a cycle and viability may improve; reduced targets would lead to significant under-capturing.

The spatial component is potentially disastrous for mixed and balanced communities, with lower requirements (20%) in suburban areas where there are already much lower proportions of affordable housing (and land is cheaper), whilst policy forces high-density high-value development into central and inner London, where taller buildings also attract prohibitive service charges and scandalously increasing ground rents. This can only exacerbate existing inequalities and create a more divided city. Part J allows developers to provide off-site where more AH can be provided. With cheaper land and construction costs in poorer areas, this will again undermine the objective of mixed and balance communities, and will exacerbate existing inequalities.

The AH requirement on public land is reduced to 40%, or 25% where there is significant transport or health infrastructure proposed, or a specific agreement with the Mayor. This is unjustified and unacceptable. The sale of public land for such limited public benefit is not justified.

There is no acknowledgement that smaller amounts of AH are less attractive to RPs. Reducing the targets will lead to more situations where no one wants to take on the AH, in most cases with a s106 provision allowing for eventual sale as market housing. Policy should acknowledge that a low level of AH can be considered a ground for refusal, especially where there is a particularly high need identified locally.

One positive change requires an Early Stage viability review if substantial implementation has not been made within 2 years.⁷ Where applicants seek to reduce AH in a consent, effectively the application should be re-assessed afresh: “the decision-maker should have regard to the potentially significant reduction in public benefits... and give this weight in the overall planning balance”.⁸ Unusually, deliverability is something to be considered in the balance when assessing an application.

Shared ownership traps buyers and has become increasingly problematic in light of stagnant property values and rising additional costs (mainly service charges). This form of AH should not be supported.

⁶ A (1), (2), B (1), (2)

⁷ Part H

⁸ Part P

With regard to AH there is a requirement that annual housing costs (including mortgage, rent and service charge) are no greater than 40% of net household income. This is positive, but more is required to ensure this is enforceable in practice. How is this expected to be monitored? Is there any analysis on costs under AH homes delivered under previous LP period?

HN4 – Gypsy and Traveller Accommodation The move to more specific borough targets is very supported. However, there is no detail as to how these targets are expected to be achieved, and what the repercussions would be for any authority that fails to meet them.

HN5 – Managing specialist accommodation covers purpose built student accommodation (PBSA) and large scale co-living. There are PBSA targets set for each borough⁹, amounting to over 3,000 bedspaces annually. These shouldn't be taken as contributing to the overall housing targets: they don't contribute towards conventional housing need, despite taking land which should be used to address that need. There has been over-delivery of PBSA and co-living in recent years relative to conventional housing. Supporting evidence¹⁰ suggests 6% of housing should be PSBA, but recent approvals are far above this. Southwark Council's planning policy seeks delivery of conventional AH (particularly social rent) alongside PBSA development. This has been very effective in ensuring onsite social rent delivery. A similar requirement should be introduced into this policy.

There is increasing over-provision for 'co-living' (Purpose Built Shared Living) which does not contribute to housing need of family-sized and affordable, wasting precious land; and while payment-in-lieu is encouraged, it is unaffordable and lost in post-permission variations. There is an absence of space standards. There is a requirement to identify concentrations of PBSA and co-living when planmaking and consider the impact on the ability to ensure mixed, inclusive neighbourhoods¹¹ although there is no detail for how to make this assessment.

HN6 Build to Rent – the covenant is only for 15 years: the only part secured in perpetuity is the "AH" which is discounted market rent, and not genuinely

affordable. The policy also makes the disturbing suggestion that affordability can be created by reducing levels of amenity and lower maintenance.¹²

HN7 – Housing size mix: this policy sets no minimum standards or guidance on bedroom size mix, so doesn't address the need for affordable family housing. must be a strengthening of requirements to deliver affordable family sized units, particularly in light of under-delivery under the previous LP.

While in some respects "London is a single housing market area" (as per para 3.95), different boroughs have different size mix needs. Contrary to the London-wide data, some boroughs need more family sized units (conventional in addition to affordable). This should be acknowledged and accounted for.

HN8 – Housing Design. Much of this has carried over from the current LP, and there is no evidence of review of outcomes of housing design policies, and no fundamental changes to the approach, despite increasing evidence of the need for homes to cope with rapid climate change. Dual aspect remains a 'nice to have' without minimum requirements; there is a minimum of one habitable room with an openable window!¹³ Family homes should be on the lower six floors to provide access to playspace "where practicable"!¹⁴

These proposals engender development-led planning rather than planning-led development. The housebuilding LPG has trialled much of the new approach, along with the 'emergency measures', but there's no analysis of the proposals this has generated nor the impact on delivery.

At pre-application on major schemes there should be modelling of different options in terms of social housing and other public benefits, viability, deliverability, embodied energy and whole life-cycle carbon emissions.

We are not building for many groups, such as older people who want to downsize without losing value, which could release a lot of family housing.

⁹ Table 3.6

¹⁰ Student Accommodation Need: analysis and review of evidence

¹¹ Part A (2)

¹² 3.88

¹³ Part A (2)

¹⁴ Part D

DRAFT NEW LONDON PLAN: LOCAL ECONOMY

The plan's over-ambitious/ unachievable housing target is driving increasing growth beyond that possible from previous reliance on the 43 Opportunity Areas and town centres for development.¹⁵ A densification approach is adopted which seeks to "optimise" density everywhere not specifically protected (e.g. MOL), including Green Belt.

The Optimisation Framework¹⁶ (PTAL-like public transport accessibility overlay of a simplistic seven-type topology from Allies & Morrison) is a mechanism to maximise density which will drive perverse outcomes (e.g., targeting well-performing estates for redevelopment or justifying very high-rise redevelopment in unsuitable neighbourhoods). It's not clear how this approach meshes with other policy designations (eg strategic industrial land (SIL), open space protections) and how conflicts would be resolved.

The plan retains the same Greater London footprint assumption and lacks clarity on whether the wider city-region will be mobilised to absorb growth. The plan relies on peripheral Green Belt/grey-belt substitution for industrial and housing capacity without demonstrating how new peripheral industrial land would be delivered or how boroughs and counties would reconcile competing housing/employment needs across administrative boundaries.

Green Belt development and industrial land substitution are not clearly worked through, is fraught with legal complexity and political difficulty, and the Green Belt review defers hard choices "into the long grass."

The economic strategy which should underpin this is missing: the London Growth Plan¹⁷ 2025 is a fictional portrait laced with boosterism and a fetish for new technologies and markets rather than the natural development of opportunities.

Industrial land, employment and logistics

- Co-location/intensification on industrial land introduced in 2021 was over-optimistic and is recognized as failing to protect erosion of industrial and is downgraded.
- The draft plan now relies on equally over-optimistic peripheral land to replace lost central industrial land, but without a credible substitution mechanism.
- The "no net loss" protections for industrial land are not reinstated: permanent industrial land losses are likely.
- A coarse understanding lack of differentiated treatment of industrial occupiers and their huge range of different needs and locations.
- Data centres are being treated as industrial but contribute little to local employment—this categorisation is questioned.¹⁸

Reinstate no-net-loss policy; provide detail of substitution mechanism and safeguards; develop better understanding of industrial typologies, needs, and locational issues.

Good Growth objectives, equality and social inclusion

- "Good Growth" objective "building strong and inclusive communities" has been dropped and equality language have been reduced or repositioned
- The plan underplays class and civic inclusion issues: central London's increasing social exclusion and loss of everyday civic functions (visitor-tourism-led specialization) are insufficiently acknowledged.

Re-state equality and socially inclusive communities as central plan objectives and press for explicit coverage of class, civic access and inclusion.

Central Activities Zone (CAZ)¹⁹

- increasingly framed through the visitor/national/international lens and tourism-led uses, with insufficient focus on everyday civic functions and Londoner's economic needs and opportunities.

¹⁵ Figure 4.1

¹⁶ MBUL2 Optimising the use of land and site capacity

¹⁷ Cited at 4.1 reasoned justification for policy

¹⁸ GLE3

¹⁹ PV2 Central Activities Zone

- is becoming narrower in use (visitor-led/retail/experience economy) and losing diverse servicing and manufacturing activity that sustain the city.²⁰
- Not inclusive growth: much as low-paid work, visitor economy, services.

Explicit policy required to protect everyday civic uses and supply-chain activities in central London.

High streets, town centres, neighbourhood centres and markets

- Town centre framing doesn't reflect the linear matrix of high streets that form London's everyday economy, and excludes c.40% of high-street fabric
- Neighbourhood/high-street revival due to densification/ renewed footfall, policy preventing car-focused out-of-town shopping, and rise of local-format chain supermarkets (Tesco Metro / Sainsbury's Local) which can anchor
- Demographic change and "suburbanisation of poverty" are reshaping high-street economics and demand.
- Markets and small independent traders need secure tenure and designation/ protection: traders' livelihoods are vulnerable to landlord speculation; designations and safeguards are required so local authority and plan policy cannot easily dismiss markets as "tourist" or marginal.²¹
- Wholesale markets are historic central function of city but their loss isn't mentioned and markets more generally are barely represented²² despite strategic importance for food supply and the local economy.

The LP must catch up with latest govt thinking re high streets.²³

Deliver a civic model for the high street.²⁴

Include explicit market list designations, protections, and policy safeguards for the 600 high streets and additional non-designated high-street fabric in Annex B: boroughs should measure and protect social value; lease guarantees for foundational businesses; minimum level of affordable workspace; options for community-led management of the market; secure tenancies for traders.

²⁰ See foundational economy research <https://foundationaleconomyresearch.com/wp-content/uploads/2023/04/Tourism-briefing-2-community-tourism-March-2023-p.pdf> + <https://foundationaleconomyresearch.com/wp-content/uploads/2026/06/Gwynedd-review-English-version-24-03-2026.pdf>

²¹ See London Assembly Social value in planning and regeneration <https://www.london.gov.uk/sites/default/files/2025->

Reinstate the London Markets Board. The wide-ranging value of markets should be acknowledged in other areas of the plan: spatial development in town centres, social infrastructure and heritage and culture.

Retail, local economy and supply chains

- Servicing, logistics and back-of-house operations that sustain the retail and hospitality economy (printers, dark kitchens, builders' merchants, fish gutters, etc) are being displaced/ consolidated, without clear relocation patterns.
- The "creative" rebranding of manufacturing and production (esp in CAZ) erases practical, low-paid, essential operations and supply chains.

Plan must assess and protect distribution, servicing and back-of-house land uses and recognize differing locational needs.

Conclusion

We need a long-term plan which creates local places where people want to spend time and money, day and night, to help tackle crime and antisocial behaviour in town centres. Use the procurement and planning systems more strategically to achieve local inclusive growth ambitions. Increase the capacity for boroughs to develop more local growth strategies and to win the investment to make them happen. Improve transport between town centres, particularly in outer London.

The London Plan should be accompanied by Supplementary Planning Guidance outlining how social value should be incorporated into local plans. This should build on the foundations of good growth principles and set out a process by which planning decisions will ensure community voices are heard and reflected, and account for the unique character of a place.

[04/Social%20value%20in%20planning%20and%20regeneration%20report%20April%202025.pdf](https://www.london.gov.uk/sites/default/files/2025-04/Social%20value%20in%20planning%20and%20regeneration%20report%20April%202025.pdf)

²² Only at PV2 (CAZ) A (12); PV3 E; 6.27

²³ <https://www.gov.uk/government/news/high-streets-to-receive-150-million-to-restore-community-pride>

²⁴ https://www.powertochange.org.uk/wp-content/uploads/2026/06/High-Streets_policy-briefing_MayJune-26.pdf

DRAFT NEW LONDON PLAN: ENVIRONMENT

There is an inevitable tension between the turbo-charged pace/quantum of development prioritised (driven by unachievable housing targets and policies for densification) and the environmental commitment to living within planetary boundaries. This tension was managed by focusing growth on brownfield in Opportunity Areas, and in the past decade on town centres. But the LP breaks from this restraint and seeks densification wherever possible, according to the flawed Optimization Framework, used to justify widespread increases in density.

Densification of this level and (unjustified) ubiquity is at odds with preserving and emboldening environmental standards, with reducing carbon emissions, with protecting and extending open space, with upholding Biodiversity Net Zero²⁵ and Urban Greening Factor²⁶, and, counter-intuitively, with achieving social housing delivery.

Open space, accessible green space, and local deficits

Severe open space pressure in some boroughs e.g. Ealing no updated public open space audit since around the 2011 census despite major population growth and development. FOI have not produced updated figures. As a result there is no clear understanding of open space per ward despite obvious losses of space and increased population. Most heavily used central Walpole Park now being monetized and 'temporarily' built on for 3 years with a major visitor attraction (treated as a meanwhile use).

New policy GHR8 Accessible Green Space (AGS)

LGAs should already have up-to-date audit of open space (many don't). They should designate AGS in their local plan, and keep designations up to date. Planning decisions "development should not result in a net loss of designated publicly AGS"... but

- This is the current policy for ALL open space; by definition this protection now only relates to designated AGS and all other open spaces are no longer so protected
- Many problematic open spaces e.g. private London squares are not publicly accessible and therefore no longer protected. Other anomaly are wildlife sanctuaries to which there is no public access, Ecological "sink" sites (for

newts, toads, biodiversity) that are intentionally not publicly accessible or private gardens like Lambeth Palace gardens.

- Local authorities seeking to increase densities on estates and elsewhere will not designate housing amenity spaces, which is often significant green space, effectively gardens for social housing. Example is MOL: Southwark designates all its parks MOL, but some authorities don't designate any MOL
- Incoherence: sometimes in the policy it talks of AGS, and sometimes of *publicly* accessible green space, sometimes applicable public open Phrases like "applicable public open spaces" and vague criteria: "the focus is on AGS rather than public open space more generally"
- Definition of accessibility Glossary defines AGS as "freely accessible for public use", including spaces the public expects to use or has a right to access, and that should be available to all under Equality Act principles.
- arbitrary thresholds and borough discretion can erase important spaces from protection, a concern now returning with AGS.

New policy GLE3 Data Centres

Data centres are an environmental, placemaking and social issue, not just an economic one

Boroughs should identify suitable locations in their Local Plan for data centres with availability of electricity and water, and opportunities for clustering. Proposals for data centres in such locations should be supported in principle; elsewhere they need to justify why the location is appropriate. Approach to back-up power should refer to best practice...

The policy is fundamentally toothless except at planmaking stage, when LPAs can be challenged. It is not fit for purpose

The Brick Lane data centre is located in a residential and commercial area because its serving high-frequency trading, needing proximity to the City and key internet infrastructure, which drives it into central London rather than peripheral locations. This leads to land-use conflict: data centres for trading are prioritized over housing needs and other social uses. Is the ability to make money a few milliseconds faster is a valid justification for using scarce city-centre land. While acknowledging London's role as a financial centre, does this alone justify such

²⁵ GHR6 Trees, Biodiversity and Geodiversity

²⁶ GHR7 Green Infrastructure and Urban Greening Factor

intensive land use for data centres? Why must data centres be in London? It was noted that Slough already has a high concentration of data centres.

Data centres can require the equivalent of one or two dedicated power stations, with a very large carbon footprint, and that current policy wording does not seem to fully grapple with this scale of impact. The policy only ask for the “lowest emission engines and fuels available,” which could still be highly polluting (e.g., using red diesel if cleaner options are unavailable) and contradicts 4.41 claim that London data centres will be “clean, green, efficient”.. Example of Wesley Estate and neighbouring estates: three data centres located right next to housing and a Gypsy and Traveller site. Also potential noise (buzzing) and dead frontages causing poor urban realm. Brick Lane would be a “big black box” in central London, with no effort made to integrate active frontages, even kiosks.

Policy should

- Demand tighter standards on backup generators
- Challenge data centers that displace housing or key community uses
- Scrutinize “latency” and “financial edge” justifications
- Every data centre should be required to have a full Environmental Impact Assessment before planning approval. Example: an inspector outside Slough refused a proposal due to lack of EIA

GLE 11 Circular Economy & GHR3 Whole Life Cycle Carbon Assessments

London Plan 2021 made big advances on these new policies, from draft to final document, and thence on through guidance in 2023. Unfortunately that progress has halted. Circular Economy policy requires landowners to ask as a first question are existing buildings suitable for retention, repair and retrofit? In answer they should provide a pre-redevelopment audit setting out alternatives considered. In practice this doesn’t happen, with even the Sec of State accepting that a tall office building could be turned into flats but was suitable for demolition because the owner didn’t want to provide residential [should all major sites be mixed use to avoid this?]

Similarly WLCCA are undertaken and total and embodied emissions calculated, but there is no requirement to get below targets. There are benchmarks with aspirational targets for the amount of CO2 per sqm but

they can be missed by a long chalk and not face any sanctions. Vauxhall Square creates more emissions than all the traffic in Lambeth for 3 years!

All major redevelopment of sites with existing tall buildings (over 30m) must work up and consider all retention options, and should be available for any mix of uses. Planning applications must demonstrate achieving 20% under benchmarks.

Other Environmental Policies

GLE12 Waste

GHR1 Energy efficiency

GHR2 Low-cost low-carbon heat

GHR4 Heat Risk

GHR5 Flood risk and drainage

GHR6 Trees, biodiversity and geodiversity

GHR7 Green Infrastructure and Urban Greening Factor

GHR10 Air Quality

PV6 Metropolitan Open Land

DRAFT NEW LONDON PLAN: TRANSPORT

Transport policy has been heavily rationalised and decentralised in the new LP, with one main policy (MBUL5) compared to the nine policies in the current LP. The Mayor's Strategic Target for transport – that 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041 – remains, but not as the prime upfront policy, instead hidden in the rationale for the policy. Reducing the need to travel has also faded away as an objective, and should be reasserted.

Transport policy is seen throughout the draft LP as subservient to enabling housing growth, as stated in the title of **MBUL5: Sustainable transport to enable London's growth**. New or improved public transport infrastructure is seen primarily as a necessary condition to facilitate growth, and is being used to justify speculative development and increased densities

Public transport and active travel are also presented as good in themselves. Private transport (private cars) are seen as a problem in multiple ways: reducing public health through inactivity and impact on air quality, increasing congestion, frustrating public transport

There is little consideration of how transport policy could support community wellbeing, health, affordability, and sustainability. Transport should instead foster social cohesion and community wellbeing; support public health through walking, cycling, and active travel; improve affordability and accessibility of London; and enable a more sustainable and less growth-dependent urban model.

Annex D: Transport interventions sets out a series of major transport projects, most of which have been proposed for many years. Many have been stalled due to lack of funds, caused by the impact of the pandemic on TfL capital reserves, a lack of govt funding, and a lack of development contributions due to the slowdown in development.

Of the proposed transport schemes, costs and benefits are often not presented, the projects lack clear evidence of deliverability, many schemes have no identified funding, the land requirements are not spelt out – including the freeing up of land from parking or redundant carriageway in LTNs – and are being promoted to

unlock development rather than meet genuine transport need. Ultimately they create speculation and redevelopment pressures long before infrastructure actually arrives.

Examples of development-led transport infrastructure interventions include the Bakerloo Line Extension, the DLR extension in Beckton/Barking, River crossings between Barking and Thamesmead/ Abbey Wood to create the 'City in the East', and the West London Orbital connections.

Preference for Improving Existing Transport Networks – repairing and upgrading existing infrastructure rather than focusing on expensive new projects, e.g. Piccadilly Line signalling upgrades, improving bus service frequency, repairing Hammersmith Bridge and Albert Bridge, better utilisation of existing rail corridors, and a general principle of maintenance and improvement before expansion.

Polycentric London

As set out in the Alternative Plan, the London Plan must actively reduce the need to travel by creating a truly polycentric city of Lifetime Neighbourhoods, where residents can access jobs, services, shopping, and leisure locally rather than travelling into central London.

This would require better orbital transport links, improved east-west connections, faster and more reliable bus services, stronger active travel networks, better links between town centres outside the centre of London. The West London Orbital is viewed more positively than some radial rail projects because it supports this vision.

Bus Services and Bus Priority

Research cited by London TravelWatch suggests that a 10% increase in journey time can result in approximately a 6% decline in demand. Declining bus speeds caused by congestion and insufficient priority – where bus priority interventions can improve bus speeds and regularity as well as smoothing traffic flow (e.g. Walworth Rd). There is concern at falling useage, service cuts reinforcing a cycle of decline, and poor public bus service and coverage in Outer London.

Solutions include: more bus priority measures; removing parking at congestion points; more bus lanes; traffic signal prioritisation for buses; better orbital bus services such as Superloop routes. Improving bus performance is essential for reducing car dependency.

Active Travel and Road Space Reallocation delivers major health and social benefits. But a modal shift will not occur without reducing space devoted to cars. Cycling remains constrained by poor infrastructure and safety concerns. Policy is needed on the reallocation of road space away from private cars, and a reduction of parking provision (see Lambeth's Kerbside Strategy)

GHR 11 Cycle and Car Parking is too supportive of the status quo. Parking reductions must be linked to improvements in public transport provision. There should be policy reducing residential parking standards over time; the introduction of workplace parking levies; removing parking where it obstructs buses.

But there are significant differences between Inner and Outer London on car use and public transport connectivity. This cannot be progressed through a one-size fits all approach. Perhaps the success of the roll-out of the ULEZ from Inner to Outer London provides lessons?

Benefits of Sustainable Transport

Transport schemes should be justified through social and economic benefits rather than solely through enabling development growth: the health benefits of active travel; the benefits of reduced congestion reducing pollution and improving efficiency; improved road safety; improved accessibility; and the economic and social impact of increased footfall in town centres and local centres

High Streets

Evidence suggests that pedestrianisation generally increases footfall; businesses often overestimate the importance of car-borne customers, and the need for vehicles for businesses. Improvements for walking, cycling, and bus access can strengthen local economies. Examples include Lower Marsh (Waterloo), Essex Market, Herne Hill, Walthamstow. More evidence should be gathered on this.

Participation and Public Engagement

In Inner London around two thirds of households do not have access to a car, yet the 'car lobby' persists in dominating the agenda. Communities need to be better engaged when proposing controversial schemes such as LTNs, bus priority measures, parking removal and road reallocation. Temporary and trial schemes can help communities experience benefits directly.

GLE9 Aviation is generally hostile to airport expansion at any of London's six main airports, with proposals for expansion "refused unless no unacceptable environmental, transport and congestion impacts are demonstrated". The problem with this approach is that what is deemed "unacceptable impacts" is not defined, and, as used similarly in daylight considerations, includes a balanced judgement of impacts set against benefits to determine acceptability.

Recent advice from the UK Climate Change Committee concludes that Heathrow expansion is not currently compatible with the UK's Net Zero trajectory under existing policies and that aviation emissions remain one of the most difficult sectors to decarbonise. Aviation emissions have more than doubled since 1990 while emissions from the wider economy have fallen substantially.

There is widespread opposition to airport expansion, concern over climate impacts, concern that increased airport capacity primarily supports leisure travel and brings no economic benefits (particularly if expansion is to enable Heathrow's function as a hub, where travellers interchange rather than enter London).

Drones are included in the GLE9 but the policy is weak and vague. There are concerns about noise, privacy and visual intrusion, security, and prevalence given the potential large-scale delivery networks. There is support for limited medical or emergency uses, but opposition to widespread commercial deployment without stronger safeguards.

GLE 10 Safeguarded Wharves is supported, but there needs to be greater emphasis on river-based transport uses, for construction materials and waste by river, for which river infrastructure needs to be retained. River transport remains underused and should form part of a sustainable logistics strategy

The key spatial impact of the Thames on movement, amenity, heritage, and identity has been gradually removed from the London Plan – from one of the five chapters in the first London Plan to no single policy apart from safeguarding wharves. This is a missed opportunity, and Londoners have suffered as the river has been hemmed in by luxury apartments and tall buildings hogging amenity. This also applies to canals, where a policy of river-based housing initiatives is needed.

Cycling and Bike Parking

There is inadequate cycle parking in developments, specifically a lack of provision for cargo bikes, including on streets. The growth of dockless cycle hire brings many benefits, but there is insufficient regulation of their use and their parking, which urgently needs addressing as these schemes inevitably expand. There is very poor integration between cycling and public transport, with wholly inadequate cycle facilities at stations (and dockless hire bikes banned from mainline station environs!). London needs better multimodal transport integration.

Rail Land Protection

Currently redundant railway land must be safeguarded for future use, particularly operational rail corridors and strategic transport land. Rail land is often sold for development and later found to be needed for future transport projects

Conclusion

We support the ambition to create a healthier, more sustainable and better-connected city. However, the draft London Plan continues to frame transport infrastructure primarily as a mechanism for enabling housing and economic growth. We believe transport policy should instead be evaluated against its contribution to health and wellbeing, social cohesion, accessibility and affordability, climate resilience, reduced inequalities, and sustainable local economies

This approach would be more consistent with the Healthy Streets Approach and the wider objectives of the Mayor's Transport Strategy. The Mayor's Transport

Strategy aims for 80% of trips to be made by walking, cycling or public transport by 2041 and places health at the centre of transport planning.

The draft LP remains overly focused on transport as an enabler of growth. Transport investment should not be justified solely on the basis of unlocking housing capacity or facilitating development. The Plan should require transport schemes to demonstrate benefits in terms of public health, carbon reduction, social inclusion, improved accessibility, reduced car dependency. **MBUL9 Healthy Streets and public realm** recognises that transport should improve people's quality of life rather than simply increase movement capacity.

We strongly support the Healthy Streets approach and recommend stronger policy support for reallocating road space from private vehicles towards walking, cycling, public transport and public realm improvements. Evidence from London's Mini-Holland programme demonstrates significant increases in walking and cycling where high-quality infrastructure is introduced. Residents in areas receiving major investment were found to be 24% more likely to cycle and recorded substantially higher levels of active travel than comparison areas.

The draft London Plan should move beyond a growth-led model of transport planning and place health, climate resilience, accessibility, social cohesion and local economic vitality at the centre of transport policy. Stronger support for buses, active travel, orbital connectivity, safeguarded transport infrastructure and demand reduction measures would create a transport strategy that better aligns with the Healthy Streets Approach, the Mayor's Transport Strategy and London's climate commitments.

DRAFT NEW LONDON PLAN: EQUALITIES, PARTICIPATION, JUSTICE, INCLUSION

The very first policy in the current LP is **Good Growth 1 Building Strong and Inclusive Communities**, which sets out the prime purpose of the LP “to build on the city’s tradition of openness, diversity and equality, to help deliver strong and inclusive communities.

This has been removed from the **Good Growth policies** (which have reduced from 6 to 4). When questioned on this, the London Plan team stated that these objectives remain running throughout the plan, but there is in fact very few mentions of them anywhere, with nothing about reducing visibility and accountability for equality and community participation.

This reflects a worrying trend: for example, the GLA-wide reorganisation appears to have diluted the Equalities team, although the Mayor’s Equality, Diversity & Inclusion Advisory Board remains.

But 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! We should frame submissions around legitimacy and democratic processes and continuous community involvement (not one-off consultations).

The Integrated Impact Assessment (IIA) should include an Equality impact assessment, as per the Public Sector Equality Duty (s.149 Equality Act 2010); but the IIA contains a superficial and positive-skewed equality appraisal. The existing IIA should be critiqued and used as a point of attack where it fails to assess negative impacts or cumulative impacts.

There is a need to embed equalities across policies (not just a single policy), and detailed amendments to multiple policies are required (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; require accessible design and enforcement rather than “should” wording.

MBUL 8 Inclusive design – current text focuses largely on lift/evacuation-lift requirements, and uses “should” widely rather than mandatory wording.

Housing policies (HN8, HN9 etc.): wheelchair-access and accessible housing provisions exist but need stronger equalities framing and enforcement. The fact that affordability targets are being reduced while the strategic target remains rhetorical is an equalities issue.

MBUL9 Healthy Streets and public realm needs stronger strategic commitments to long-term maintenance, enforcement and cumulative impact assessments, not merely delegated to boroughs.

Food access and security: food must be treated as infrastructure — referenced across spatial strategy, housing, transport, economy and environment — not limited to hospitality/retail mentions. The draft LP references to food are limited and oriented to food & drink/hospitality rather than food security, affordability and culturally specific food access.

Monitoring, transparency and enforcement: the GLA has removed many of the Opportunity Area monitoring dashboards and replaced them with short “pen portraits”, not even produced by the LP team. There is no visible monitoring of tenure and mix of homes, of jobs, of impacts or of community benefits or promised infrastructure, let alone of the equalities impact. Stronger monitoring, cumulative impact assessment and enforcement mechanisms are required.

Socioeconomic status should be declared and treated as a protected characteristic. The GLA recognises socioeconomic disadvantage even if it is not a formal protected characteristic in the Equality Act; we need to press for socioeconomic impacts to be treated explicitly in assessments and policy.

CHANGES REQUIRED

Insert or restore a high-status **Good Growth policy** (or mayoral Statement of Community Involvement) explicitly requiring:

- Continuous community involvement / co-production and democratic accountability mechanisms across plan-making and development decisions.
- Transparent, published monitoring (annual) on 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.

Housing

Link affordable housing provision to borough median income and to need (proposed benchmark cited: UN definition = housing costing no more than 30% of household income).

Require accessible and wheelchair-accessible dwellings and strengthen enforcement of accessibility standards.

Inclusive design and accessibility

Broaden inclusive design beyond evacuation lifts: ensure buildings and public realm deliver “convenient and welcoming” environments with no disabling barriers; convert “should” statements to mandatory requirements where necessary.

Economy, markets and culture

Protect small and independent businesses, street markets and local cultural assets through explicit policy safeguards and affordable retail protections.

Food security and infrastructure

Treat food as infrastructure within spatial strategy and reference food access, affordability, culturally appropriate supply and food growing across housing, transport, public realm and economy policies.

Integrated Impact Assessment / Equality Impact

Require a full, transparent IIA/EqIA that assesses negative impacts and cumulative effects on protected groups and socioeconomic disadvantage; publish data and make impact assessments iterative (updated as policies change).

ALTERNATIVE LONDON PLAN FOR A CARING CITY

1. Mayor’s Statement of Community Involvement (SCI)

The Mayor will require high standards of effective community involvement, including for boroughs, neighbourhoods and development sites – to be contained in a Mayor’s SCI. This would apply to the Mayor’s own Planning Frameworks for Opportunity Areas and Regeneration/Intensification Areas; strategies, policies and guidance, research and toolkits; to the Mayor’s agencies, such as TfL and Development Corporations

2: Equalities Impact Assessments: when options are considered and before decisions are taken, Equalities Impact Assessments must be produced – not as an afterthought. They must consider the impact on all groups with protected characteristics, and must consider possible mitigations and their likely effectiveness. They must be fully published and available for inspection and challenge. The Public Sector Equality Duty must be taken more seriously by local authorities.

3: Visibility of racial inequalities and patterns of deprivation: the London Plan will address the systemic invisibility of certain groups and push for their visibility, aiming to eliminate structural racism in the planning process and public life in London. The Mayor will make an explicit commitment to the support of racially minoritised and migrant communities, specifically diverse working class communities

4: Co-production: the London Plan will embed meaningful co-production as a core value in planning practice and policy-making. Applicants will be required to provide early engagement (early in the pro-application process), adopt meaningful co-production and show its effect on substantive aspects of a design. Applicants should provide Social Value Statements based on this early engagement. Councils will set up Community Review Panels alongside Design Review, with representation by historically invisible communities.

5: Community spaces: communities will be given more access to much-needed, multi-purpose, low or rent-free community spaces for meeting and dialogue, which enable effective participation

6: Close revolving doors: elected Councillors and planning officers should not move directly into working for planning consultants, PR companies and developers. Decision-making processes are not robust enough to ensure probity in public life. When public officials and planners find jobs in the private sector they inevitably trade public information to benefit private interests.

LONDON PLAN: LIFETIME NEIGHBOURHOODS

Lifetime Neighbourhoods are places where people can truly live locally, with everything needed available by walking, biking or public transport. It is planned to accommodate people at all stages of life, for families to grow and older people to have the facilities they need, with the benefits of enabling families to stay together in the same area. It is a neighbourhood of a scale where people can legitimately contest issues of inequalities, distribution of amenities, healthcare, schooling, air pollution and other issues of spatial justice. It is the named local village/ town with which we identify.

Many of the problems discussed throughout the strategic plan are experienced at the neighbourhood level. Just Space has championed this as a good principle guiding planning for London. And it is the opposite of the soulless new ‘quarters’ manufactured from high-rise development aimed at investors and unsuitable for community life.

The GLC briefly upheld a ‘Communities First’ policy which demonstrated the efficacy of this approach, nurturing a ring of residential enclaves on the edge of central London threatened with displacement, which have ensured the CAZ has retained its rich mix of residential essential to maintain London’s inclusiveness.

Unfortunately, this approach has not informed the draft LP, which is driven by unreasonable government housing targets, requiring significant densification, using tools like the new Optimisation Framework and its coarse London Context map to do otherwise and maximize density. This approach privileges viability and developer profitability over need, and developer-prioritised ‘deliverability’ over community-led planning. It is driven by ideology, not an analysis of outcomes from policies such as Opportunity Areas.

The Plan’s proposed targets and spatially differentiated affordable housing thresholds (20% Outer, 25% “in-between”, 35% inner/central) won’t deliver the range of genuinely affordable, intergenerational housing foundational to Lifetime Neighbourhoods, and will exacerbate displacement with use of PIL.

Characterisation, design codes and borough-level character studies

The London Context map/topology approach²⁷ is crude and misleading, and focuses on built form rather than demographics, deprivation, local economy and community or cultural identity and heritage.

Borough generated character studies must include embedded culture, markets, local economies, and demographic/deprivation data — not only architecture — to defend place identity and make a case for lifetime neighbourhoods.

Risk that characterisation + optimization becomes formulaic/homogenising and strips local agency.

Lifetime neighbourhoods: gaps and protections needed

Insufficient weight is given to lifetime neighbourhood concepts (starting with people, communities, needs).

Estate ‘regeneration’ notoriously erases working class communities on public land, who rely on intergenerational living to manage burdens and risk, and replaces them with atomistic gentrification and multiple profit-seeking land ownership.²⁸

Infill on council estates: multiple examples where infill schemes remove open amenity space²⁹, fail to ballot residents (because they avoid demolition triggers), and insert large proportions of private housing on council land to cross-subsidise schemes. First-phase infill blocks used for decanting can become “stuck” mid-regeneration (viability issues), leaving mixed and harmful outcomes.

Community centres are often demolished or replaced with poorly managed outsourced facilities with inequitable access. Fire-regulation liability and other reasons given to avoid restoring tenant management.³⁰

The LP should provide stronger protections against harmful estate infill, requirement for community control/management of community spaces, minimum expectation of community space ratio to homes, and safeguards for intergenerational, multi-use spaces.

Food accessibility, autonomy, security

²⁷ MBUL1 Spatial Strategy and MBUL2 Optimising the use of land and site capacity

²⁸ Example of Heygate/ Elephant: 1,200 social homes demolished and replaced with c3,000, with only 92 social homes (3%)

²⁹ E.g. Whie City estate, South Lambeth Estate, Clapham Park Estate (Lambeth)

³⁰ E.g. Peabody examples (Thamesmead) and Holloway Park (Islington)

Food growing, distribution and accessibility should be considered infrastructure within the spatial strategy³¹: markets, food growing, local food manufacturing,

storage/warehousing, community kitchens, and “right to grow” should be explicitly protected and enabled.

Food hubs are a growth industry for supporting communities through the increasing cost of living crisis. Nowhere are they mentioned. The draft LP coverage is hopeless, only mentioning food in a retail/hospitality context, a brief paragraph about markets, and a note encouraging food growing in communal outside amenity space³². There is no substantive food-security/resilience treatment in the environment chapter.

The LP should designate Strategic Food Areas; protecting markets; local food manufacturing (not just “dark kitchens”); warehousing and cold storage; community kitchens/affordable food hubs; Right to Grow/allotments; better integration into resilience planning.

Health inequality and impact assessments

Inclusion of health inequality evidence and its connection to impact assessment processes to inform Equality Impact Assessment and lifetime neighbourhood arguments.

Community infrastructure: libraries, markets, intergenerational spaces

Libraries and schools are referenced in Annex F, but community centres, youth facilities, specialist or ethnic centres, street markets, food hubs, are all absent.

London Schools Challenge in the 2000s transformed the quality of education in London, but this progress is being reversed by the entire school network being hollowed out and under pressure – with many schools closing – due to unaffordable homes pushing families out.³³ There is no reference whatsoever to this in the draft LP!

There is a need to protect and nurture intergenerational spaces and markets as social glue, not just commercial assets, identifying social and economic value.

Conclusion

Planning is being forced to become dangerously centralized, with the focus deliberately turned away from the needs of communities. The LP is essentially a manual for developers.

The entire frame of housing targets should be rejected as crude, unnecessary, and disconnected from need. The 28 boroughs failing the Housing Delivery Test are required to implement the “tilted balance” in decision-making, leading to perverse outcome of homes delivered but unaffordable and unoccupied.

A “Communities First” approach is required to protect communities and neighbourhoods threatened by erasure and gentrification.

The LP must

- embed demographic/deprivation data, cultural identity, and local economy into borough character studies and the character chapter.
- Make lifetime neighbourhood an explicit spatial strategy priority with measurable requirements for community infrastructure and protections against harmful densification approaches.
- Prohibit or tightly restrict infill on council estates that destroys key amenity/open space unless community ballot/consent is obtained
- Require full impact assessments and resident balloting for schemes that materially change estate living conditions, including clear rules when demolition thresholds are not met.
- Require community-centred outcomes (not token café/lounge spaces) and protect community management or shared governance arrangements for new community spaces; disallow outsourcing that fragments access by tenure.
- Set minimum community-space provision per number of residential units (flexible standards) and clear criteria for use and management.
- Declare food (growing, markets, local manufacturing, storage, distribution, community kitchens) as part of strategic infrastructure in the spatial strategy and resilience chapter.
- Designate Strategic Food Areas, protect markets, and mandate local food production/manufacturing/warehousing space within local plans.

³¹ See Sustain (Sustain – sustainable food and farming), work of Tim Marshall

³² reference to para/table in Annex F for libraries and public service infrastructure

³³ Ref Southwark school closure mapping (Southwark Law Centre/PILC)

- Integrate health inequality metrics into Quality Impact Assessment and require assessments for major housing and regeneration schemes with explicit health equity indicators.



An informal alliance of community groups, campaigns and concerned independent organisations – aiming to improve public participation in planning, ensuring policy is fairer towards communities, in a system dominated by the interests of developers