

LONDON ASSEMBLY

City Hall
Kamal Chunchie Way
London E16 1ZE
Tel: 020 7983 4000
www.london.gov.uk



Andrew Boff AM
Chairman of the Planning and Regeneration Committee

Sadiq Khan
Mayor of London
(Sent by email)

12 November 2024

Cc Jules Pipe OBE
Deputy Mayor for Planning, Regeneration and the Fire Service

London Plan High Level Document, submission from the London Assembly Planning and Regeneration Committee

Over recent years the Planning and Regeneration Committee has set out several reports and letters with the intention of shaping the direction of the next London Plan. This includes:

- [Shaping the Future London Plan](#), report, March 2024
- [Future of the London Plan and the Planning for London Programme](#), letter, May 2023
- [The Future of Planning in London](#), report, January 2023

The Committee has also set out its feedback on several of the GLA's London Plan Guidance documents:

- [The Mayor's design guidance](#), letter, September 2022
- [Affordable Housing and Development Viability](#), letter July 2023
- [Good Quality Homes for All Londoners](#), consultation response, January 2021

Finally, the Committee has run in-depth investigations into various areas that are of key importance to the London Plan, including:

- (Upcoming output) Social value in planning and regeneration, Winter 2024/Spring 2025

- (Upcoming output) Unlocking development in London, report, Winter 2024
- [Retrofit vs Rebuild](#), report, February 2024
- [Open Planning? Community engagement and transparency when the Mayor calls in planning applications](#), report, March 2022
- [Opportunity Areas and Housing Zones](#), letter, March 2022
- [London Plan tall buildings policy](#), letter, March 2021

Over the course of these investigations, the Committee has set out many recommendations to the Mayor, to which the Committee would point the GLA London Plan team in their preparation of the high level document to underpin the new London Plan.

There are a few key areas that the Committee would like to emphasise as fundamental to the development of the new London Plan. Those are:

Community participation in planning

The Planning and Regeneration Committee has a long-standing interest in and drive to improve community participation in planning. In the ‘Open Planning?’ investigation into the Mayoral call-in process, we heard that it is essential that local people and communities can engage in the planning process.¹ Places cannot be effectively designed and developed without the input of the people and communities who already walk those streets.

London has diverse and extensive community activism when it comes to planning. Despite often being time and resource poor, there are many Londoners who devote their time and energy to ensuring that planning authorities deliver developments that allow communities to thrive. The Committee heard from such community groups that suggested growing disillusionment with the planning process, particularly regarding transparency and trust.

In the Committee meeting, Michael Bach, of the London Forum of Amenity and Civic Societies, indicated that the process feels predetermined towards approval whilst noting that GLA officers were prepared to meet objectors. Other guests, such as Clare Delmar from Listen to Locals, and Mark Brearley from Vital OKR, also noted that it was difficult for communities to have meaningful input into the Mayor's decision making, describing the processes as “opaque”.

The call-ins investigation highlighted the strength of feeling within community groups, showing an urgent need to improve the call-in process, leading the Committee to make [several recommendations](#) around transparency in decision-making and community participation in planning. The GLA outlined its commitment to openness and transparency in its response, and the Committee looks forward to seeing how this will be taken forward in the next London Plan.

Similar issues of access emerged in the Opportunity Areas (OAs) and Housing Zones investigation. Just Space argued that there are higher rates of gentrification and population churn in OAs than in other parts of London. A 2021 Centre for Labour and Social Studies

¹ [Open Planning? Community engagement and transparency when the Mayor calls in planning applications](#), report, March 2022

(CLASS) study found that gentrification rates were 9-13% higher in Lower Super Output Areas (LSOAs) located within OAs than in LSOAs outside of them.² Population churn was significantly higher across all three of their case-study boroughs within OAs and 9-30% higher than in non-OA areas.³

Representatives from the London boroughs of Brent and Southwark felt that OAs have worked well in enabling strategic development and ensuring that the wider infrastructure needs of an area are addressed.

Just Space expressed concerns about the social and economic impact of OAs on local residents and business. Furthermore, some community groups feel that they have been excluded from the process of designating OAs and the development that takes place within them, leading to the Committee making a [number of recommendations](#) around improving community participation at every part of the OA process.

The Committee revisited the topic of community engagement in the Future of Planning in London investigation held in 2022. The Committee's guests pushed for the GLA to create space for meaningful co-creation and participation in how Londoners build and design their localities. The Committee made [several recommendations regarding access](#), including digital inclusion and accessible data for Londoners, to prevent the marginalisation of some communities in London, which are relevant to the new London Plan but also the process of its development

Finally, the Committee is currently running an investigation on social value in planning and regeneration, and we will share findings and recommendations from that work with you in due course.

Accessibility and inclusion in planning

The built environment can present extensive equalities challenges, and the Committee has run several investigations into access and inclusion in planning, including gender and planning, accessibility and planning, and crime and planning.

During our accessibility investigation, there was consensus among our panellists that disabled people face specific challenges going about their daily lives. Road and street design emerged as a significant concern, with guests pointing to issues such as the absence of dropped kerbs, obstructions, and inaudible pedestrian crossings.⁴ In terms of housing, guests told us that planning needs to consider accessibility not just within the living space, but also in the boundaries of the dwelling, from parking to lift access, as well as integrating housing into the wider built environment, so that residents with impairments can easily access transport and other services.⁵

² [Pushed to the Margins - Runnymede CLASS report June 2021.pdf \(ams3.cdn.digitaloceanspaces.com\)](#)

³ The findings are based on a study of gentrification in the boroughs of Southwark, Waltham Forest and Brent

⁴ Planning and Regeneration Committee meeting, 28 November 2023 [Panel 2 minutes](#)

⁵ Planning and Regeneration Committee meeting, 28 November 2023 [Panel 1 minutes](#)

Differences in culture and practice across London's boroughs were noted by Harriet Bell, a disabled London worker with personal experience; 'There are different cultures and perhaps there is a feeling that inclusive access is something for authorities within the Central Activity Zone (CAZ) perhaps more than the outer boroughs.'⁶ It is essential that in the creation of plans, diversity is reflected in the individuals engaged with, and it is encouraging to hear of the efforts made by the team to consider this through the engagement process.

In terms of gender, we heard that the design of public spaces and provision of infrastructure is limiting women and girls' freedom and can deprive them of opportunities. Guests told the Committee that there is a lack of data available on women and girls in the built environment and that to support gender-informed planning decisions, gender disaggregated data should be collected.⁷ The GLA informed us that the Good Growth by Design team expect the next iteration of the London Plan to build on gender as an issue.

Finally, in the crime and planning investigation, the Committee considered the Metropolitan Police Service's (MPS) involvement in the built environment and our planning system, particularly in relation to Secured by Design (SBD)⁸ principles. We heard differing views about the success of SBD principles, including how they can create challenges around access and inclusion. Guy Ferguson, Chief Executive Officer at Police Crime Prevention Initiatives (CPI), highlighted to the Committee the positive impact of SBD, listing crime reduction, benefits in community cohesion, and carbon cost reduction. Other guests raised concerns about its impacts on young people and inclusive design.

The Deputy Mayor identified that inclusive design principles should carry more weight, and that in instances when tensions arose, inclusion would 'always win out', as per the guidance accompanying the London Plan.

This series of investigations highlighted both the importance of Londoners being able to influence the planning system to enable a city that works for them, but also the challenges that arise when trying to balance competing priorities. The Committee has set out [several recommendations](#) with the aim of identifying how the next London Plan can create a more accessible, inclusive, and safer city for all.

Housing typologies - tall buildings and family homes

After an investigation into housing typologies in autumn 2020, the Committee concluded that tall buildings were not the answer to London's housing needs and should not be encouraged outside of a few designated and carefully managed areas. We heard that tall buildings were costly and inefficient, with negative impacts on the health of those living in them. In early 2025 the Committee plans to undertake further investigations into building typologies in the context

⁶ Ibid

⁷ Planning and Regeneration Committee meeting, 29 February 2024, [minutes](#)

⁸ Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop and visit.

of the new housing targets. The Committee has had concerns that the London Plan 2021 does not provide adequate guidance to ensure new tall buildings are appropriate to their location and surroundings.⁹ Tall buildings should not be deemed as the sole solution to the housing crisis but will play a role in delivering on the revised housing target. Understanding the role those tall residential buildings play alongside a diversity of housing typologies, the committee encourages clearer policy guidance, including distinctions based on height and use.

Whilst the Committee called for clearer policy distinction to be drawn between tall buildings for residential use and those for commercial and mixed-use, it also did not believe tall buildings to be the answer to London's housing needs. Concerns relate to the impact on neighbourhoods and, London's character. Tall buildings can also be costly to build, operate and maintain, are not best suited for family housing - which is much needed in London - and can have significant environmental impacts.¹⁰

The Committee recognises the achievements of the London Plan 2021 in terms of developing policies for play and recreation for children and young people, spearheaded by former Planning Committee Chair Nicky Gavron. However, at the Committee meeting, heard about 'exceptions' where play space is only provided 'nearby' rather than on site and encourages a review of these exceptions. The Committee feel it would be appropriate to recognise Nicky Gavron and her contribution to this area in any further development of these policies.

The Committee's [2021 recommendation](#) was that the Mayor should develop additional London Plan Guidance for residential tall buildings, which should include consideration of dwelling typologies, size mix, space standards, tenure mix, indoor and outdoor amenity space, as well as the environmental impacts. This should either be incorporated into the next London Plan, or in future London Plan Guidance.

The Committee's submission to the [Good Quality Homes for All Londoners](#) gives further detail on recommendations regarding tall buildings. The submission also provides details on alternate forms of density to address housing needs.

Monitoring and evaluation

Across the course of many investigations, the Committee has heard frustration with the current systems in place for monitoring and evaluating the London Plan and specific policies within it. This came through particularly on the topic of Opportunity Areas. Just Space noted in its submission that 'the monitoring process fails to record key outcomes, for example, in relation to delivery of housing at social rent levels, achievement of effective public and open spaces, levels of occupancy and foreign ownership, levels of family housing delivery and no assessment of the welfare of existing uses in these areas.'

⁹ London Assembly Planning and Regeneration Committee, [Consultation Response, Good Quality Homes for All Londoners London Plan Guidance](#), Jan 2021

¹⁰ Ibid

The Committee developed [several recommendations](#) related to monitoring and evaluating OAs in 2021, yet even in its recent 2024 meeting on Unlocking Development in London, heard further similar feedback. Just Space again noted ‘the London Plan is, in many ways, very good. One of the key things is monitoring. Monitoring is deficient, to put it nicely. We are several years behind. We are monitoring far less than we used to do’.¹¹ This was reiterated by Jayshree Ashley, Lecturer in Town Planning, London Southbank University, who stated that there is a real opportunity for strengthening monitoring within the London Plan. Both in terms of a better understanding of who should take accountability for that monitoring, and where monitoring flags issues, whose responsibility it is to fix those issues.

The Annual Monitoring Report has experienced many delays over recent years. While we note the publication of the 2021/22 data in May 2024, we are still awaiting publication of monitoring reports for 2022/23 and 2023/24. There is an opportunity with a new London Plan to rethink the monitoring and evaluation framework, ensuring transparency of what the London Plan delivers and timeliness of that reporting.

Environment and climate change

The Committee would also like to draw the GLA’s attention to last year’s investigation on ‘[Retrofit vs Rebuild](#)’, which looked at the environmental impact of the built environment, with a focus on embodied carbon.¹² Throughout this investigation we heard how it is critical to ensure that building sustainably is at the heart of how we construct for the future. We heard that currently, in London, buildings account for an estimated 68 per cent of London’s carbon emissions,¹³ and embodied carbon can make up a significant proportion of a typical building’s total carbon emissions – between 30 and 70 per cent.¹⁴

The Committee recognises that the London Plan has UK-leading policies that seek to reduce embodied carbon, such as the Whole Life-Cycle Carbon (WLC) Assessment and the circular economy policy. During our investigation, we heard that the WLC policy is incentivising industry to understand, and aim to reduce, embodied carbon in developments.

During the Committee meetings, we heard that there is still opportunity for the WLC and circular economy policies to go further and have stronger impact. Dr Julie Godefroy, Head of Net Zero Policy at the Chartered Institution of Building Services Engineers stated that what is currently missing from the policies is a thorough evaluation of the options as part of a WLC assessment. I.e., if an applicant opts for rebuild, the assessment only looks at rebuild and does not compare it to retrofit alternatives. This leaves the system open to bias.

¹¹ London Assembly Planning and Regeneration Committee, [Committee meeting 9 July 2024](#)

¹² Embodied carbon arises from the energy used to extract, transport and assemble materials to construct buildings. It also arises from work done to maintain and repair buildings; and later, to demolish them and dispose of the waste.

¹³ Business LDN, [Place Commission](#), May 2023

¹⁴ Arup, [Net Zero Carbon Buildings: Three Steps to Take Now](#)

At our meeting, Kerstin Kane, Principal Planning Officer (Sustainability) at City of London Corporation, and Simon Sturgis, Founder of Targeting Net Zero, spoke about the importance of having a third-party independent audit to improve the robustness and credibility of the WLC Assessment.¹⁵

In our report '[Retrofit vs Rebuild: Reducing Carbon in the Built Environment](#)', the Committee set out several recommendations, including standardising assumptions, improving accuracy, and properly considering alternatives in WLC assessments submitted by developers and a review of the infrastructure, products and services that are needed to support the circular economy in building and construction. Chapter two of the report in particular sets out opportunities for the London Plan and London Plan Guidance to be strengthened.

Upcoming reports – unlocking housing development in London

We are all aware of the need to increase the supply of housing in London, including affordable homes; London faces a housing crisis like no other in the country. This year the Committee has been running an investigation into unlocking housing development in London. We have heard of the wide ranging and complex issues facing the development and planning sectors, and how many of the challenges are exacerbated in the capital. We heard detailed evidence from a variety of stakeholders and will be publishing a report on the findings in due course, which will include recommendations for the upcoming London Plan.

Upcoming reports – social value in planning and regeneration

The Committee's current investigation considers how planning and regeneration can maximise 'social value' to communities. The Committee is looking at markets and business run in TfL arches as case studies for how planning and regeneration deliver social value. Again, this investigation picks up the issue of community participation in planning, among other key issues, and we look forward to sharing our findings and recommendations with you in the near future.

Upcoming reports – housing typologies

The final investigation that the Committee will undertake this municipal year will look into housing typologies. As outlined above, the Committee has undertaken extensive work in this area, and will again consider this topic with a focus on how Londoners' health is impacted by the building typology that they live in. We look forward to sharing our findings on this important topic in due course.

Yours sincerely,



¹⁵ WSP, [How Whole Life Carbon optioneering is changing the planning landscape](#), 30 January 2023. See also: City of London, Planning Advice Note, [Whole Lifecycle Carbon Optioneering](#), May 2022

Andrew Boff AM

Chairman of the Planning and Regeneration Committee