LSDC response to the London Plan consultation

1. Viability and delivery (section 1.4)

The revised London Plan will be critical to ensuring the London Growth Plan is commensurate with the Mayor's vision for a net zero, climate resilient, fair and inclusive city, while also supporting economic growth and tackling the housing crisis.

There is no inconsistency between tackling the housing crisis and ensuring that all new homes are fit for the future: high-quality, healthy, and environmentally sustainable.

The LSDC believes the London Plan should retain its strong social and environmental policies, which have already delivered significant benefits for Londoners' quality of life. There is a need to strike a balance between commercial viability and regulation that protects a healthy environment. Our view on this is informed by a roundtable we convened with built environment professionals in June 2025, in order to develop a position that is evidence-based and practical.

We believe this balance can be successfully achieved: a paper published this month by Shelter and Arup shows how to viably and sustainably deliver one set of 90,000 social rent homes through an "integrated approach" of new builds, retrofit and high-quality responsible conversions of commercial properties through the planning system.

However, any consideration of re-balancing away from current environmental standards must be accompanied by robust evidence, set out transparently in relation to specific policies and their economy-wide impacts. For example, developers have told us that social value policies in particular don't usually impact developer costs and viability. But the legacy benefits they yield can create stewardship challenges for resource-constrained local authorities (and others) if not considered at the outset, e.g. an inability to staff and operate a newly built community centre. The LSDC's report on Social Value shows how such policies could be further integrated within the London Plan. https://www.london.gov.uk/who-we-are/city-halls-partners/london-sustainable-development-commission-lsdc/social-value

We note that developers would prefer more closely aligned policy at the local, regional and national level. This should be explored, but any efforts to align should not undermine the ambition of the policy objectives in London.

2. Energy standards (section 5.1)

The consultation document is right to state that "carbon reduction and economic growth can go hand in hand," and that policies which avoid baking in energy usage and carbon emissions today, will "avoid later costs of retrofit".

However, policy measures should be more flexible and nuanced. For example, stakeholders have told us that the current London Plan's 'Be Lean' policy is hard to deliver in residential developments, but it is generally easy to deliver carbon savings of 35% - and even 50% - below Part L of the Building Regulations. However, the inverse of these two policies is true for commercial developments.

Carbon offsetting prices should be updated and harmonised across boroughs and the GLA. It is anticipated that offsetting costs will reduce as the national grid switches to renewables.

Boroughs' offset funds are currently under-used across London as a whole (though this varies widely between boroughs), and delivery mechanisms must be strengthened and resourced to unlock investment.

Local authority planning teams have lost personnel and skills since 2010, and this should be addressed in order to unlock faster, high-quality development. For example developers face a 6-12 month wait for development approval. There is also a lack of planning lawyers in local planning authorities, which adds further delay to a section 106 agreement being negotiated and signed with a consent issued.

3. Urban heat networks (section 5.2)

A coordinated plan for heat networks should be developed, with clear focus areas and timescales. This should establish district level heat networks (DHNs), by convening asset owners to help improve efficiency and connect the many existing but disparate systems owned by boroughs, housing associations and others. This should also incentivise connection: many developments are built ready to connect to DHNs due to regulations, but are never plugged in due to high opportunity costs.

Greater transparency is needed on locations and energy costs to users, as well as on waste heat sources (e.g. from sewers and data centres). For example, in Denmark this information is publicly available online.

Heat networks should plan for future tech innovation – for example, we now have air-source heat pumps that can fit in a boiler cupboard, which were not available 10 years ago. However, we should not stop installing heat networks while waiting for new technology to emerge. Although we recognise it can be frustrating to see successive new technologies render old ones obsolete (e.g. CHPs), DHN infrastructure can continue and be powered by new tech in line with 10-year replacement cycles.

4. Whole lifecycle carbon and circular economy (section 5.3)

Whole-lifecycle Carbon and Circular Economy policies should apply to all major developments, not just referrable ones. The sector has moved on since the last London Plan, for example the 'RICS whole life carbon assessment (WLCA) standard, 2nd edition 'https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/construction-standards/whole-life-carbon-assessment. Clearer metrics would help this not be a tick-box exercise. The process should lead to design changes.

Greater policy alignment between boroughs and the GLA (especially on whole-lifecycle carbon and carbon offsetting costs) would reduce complexity and risks, therefore costs.

5. London's Open Spaces (section 5.6)

Given that current national policy links Metropolitan Open Land (MOL) to green belt, this can now be interpreted as requiring London's MOL to be released for housing and other development. We understand that the Mayor intends to redraft the London Plan to distinguish between MOL and green belt. However, as the new London Plan will not be forthcoming until 2027, we would urge the Mayor to look at protecting the MOL now. However, we agree that certain areas of MOL should be considered for release from MOL designation – those which provide little value to the overall purpose of the MOL, and which are close to transport links and as such in sustainable locations.

The Mayor's forthcoming review of the green belt should incorporate site visits not just a desktop survey. This would provide an evidence base to assess the validity of any proposals to build on land which is technically 'green belt' but which may have limited biodiversity value in reality. The Mayor should aim to work with all boroughs containing green belt to produce an aligned green belt review, as well as consistent application of national policy criteria when it comes to its release as well as granting permission for development.

6. Heat risk (section 5.18)

The revised Plan should design for the climate in 2050, not for today – building resilience to the higher temperatures and flooding we know are coming.

It should urgently tackle heat risk in homes, in line with the London Climate Resilience Review commissioned by the Mayor. This disproportionately impacts Londoners who are already marginalised or living in flats (higher risk exposure); those with underlying health issues (higher risk impacts); and those on low incomes (less able to mitigate risks themselves). The risks, and potential solutions and costs, are assessed in an Arup report commissioned by the Climate Change Committee https://www.theccc.org.uk/wp-content/uploads/2022/10/Addressing-overheating-risk-in-existing-UK-homes-Arup.pdf

The Plan should address the following:

- Encourage climate adaptation improvements, through planning incentives or grants, prioritising nature-based solutions.
- Introduce minimum standards for overheating mitigation (e.g. solar shading, passive ventilation) in all developments.
- Develop delivery milestones and support for climate adaptation retrofit initiatives, including coordination with key asset owners such as housing associations.

London Sustainable Development Commission

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