

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3515

London Plan – publication and statutory consultation

Programme: Making Best Use of Land

Executive summary:

The Mayor is required to prepare, publish and keep under review the Spatial Development Strategy for Greater London (the London Plan); and to carry out appropriate consultations as part of that process. At any time, the Mayor may prepare and publish a replacement London Plan. It is proposed that a new Draft London Plan, and the associated assessments, be consulted on for 13 weeks, from 16 July 2026.

Decision:

That the Mayor:

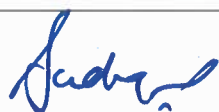
- approves the Draft London Plan (Appendix A) for the purpose of formal statutory consultation
- notes the Integrated Impact Assessment (IIA) (which includes the Equalities Impact Assessment) (Appendix B), and the Habitats Regulation Assessment (HRA) (Appendix C), which have been prepared in respect of the Draft London Plan
- approves the 13-week consultation period; and placing the necessary statutory notices to start the consultation on 16 July 2026
- approves spending up to £250,000, from the London Plan budget, to fund the public consultation process; and printing the Draft London Plan, the IIA and the HRA
- delegates authority to the Assistant Director for Planning & Regeneration, in consultation with the Deputy Mayor for Planning, Regeneration and Fire Service, to approve and authorise any minor editorial or factual amendments to appendices A, B and C, prior to publication
- withdraws the draft Fire Safety London Plan Guidance from the date of the publication of the Draft London Plan for consultation.

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

7/7/26

PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report

1. Introduction and background

- 1.1. The Mayor is required to prepare, publish and keep under review the Spatial Development Strategy for Greater London (the London Plan); and to carry out appropriate consultations as part of that process. The London Plan is the spatial representation of the Mayor's vision for good growth; and sets out the framework for how London will develop over the next 20-25 years. Plan policies relate to housing; environment; economic development; infrastructure; and design. Local authorities' Local Plans must be in 'general conformity' with the London Plan – ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably. The London Plan also informs decisions on planning applications across London.
- 1.2. The Mayor may prepare a replacement London Plan at any time. The current London Plan was formally adopted in March 2021.
- 1.3. The Mayor wishes to have an updated statement of his spatial priorities and planning policies in place before the end of his current term. This new Plan will refresh his principles for good growth. It will also enable London to respond effectively to the significantly changed and challenging environment that has emerged since the current London Plan was adopted. The Mayor intends to develop an updated London Plan in a manner that is: compliant with requirements; evidence-based; and capable of meeting the city's needs over the next 20 years.
- 1.4. The scale of change since 2021 (when the current London Plan was adopted) is considerable. It includes:
 - the growing scale and urgency of London's housing crisis, and increased challenges associated with housing delivery
 - the long-term impacts of the COVID-19 pandemic on how Londoners live and work
 - the introduction of a substantially revised draft National Planning Policy Framework
 - wider political uncertainty and global geopolitical pressures that continue to affect London's development environment.
- 1.5. Preparation of the Draft London Plan and the associated assessments is now complete. It is proposed that consultation on it will run for 13 weeks, from 16 July 2026.
- 1.6. This Mayoral Decision (MD) seeks the Mayor's approval of:
 - the Draft London Plan (Appendix A), for the purpose of formal statutory consultation
 - the placing of the necessary statutory notices to start the consultation on 16 July 2026, for 13 weeks.
- 1.7. The Mayor is asked to note the Integrated Impact Assessment (IIA) (which includes the Equalities Impact Assessment) (Appendix B), and the Habitats Regulation Assessment (HRA) (Appendix C), which have been prepared in respect of the Draft London Plan.
- 1.8. Approval is sought to spend up to £250,000 for the public consultation. This includes the placing of the required statutory notices; and the printing the Draft London Plan, the Integrated Impact Assessment (IIA) and the Habitats Regulation Assessment (HRA).

- 1.9. Delegation of authority is also sought for the Assistant Director of Planning & Regeneration, in consultation with the Deputy Mayor for Planning, Regeneration and the Fire Service, to approve and authorise any minor editorial or factual amendments to Appendices A, B and C prior to publication.
- 1.10. The Mayor is also asked to withdraw the draft Fire Safety London Plan Guidance (LPG), as its content is addressed in the policies of the Draft London Plan. There have been significant regulatory changes to fire safety since the consultation on the draft Fire Safety LPG was undertaken in 2022. The withdrawal will provide clarity to the development sector, and decision-makers, on the applicable planning policy in this area. This approach provides a transparent and proportionate means of maintaining a coherent policy framework aligned with the Mayor's principles for good growth.

The Draft London Plan

- 1.11. The Mayor's ambition for good growth – growth that drives economic productivity, and is socially inclusive and environmentally sustainable – continues to underpin the Draft London Plan. This is seen in renewed and updated headline good growth objectives; and new more granular sub-objectives.
- 1.12. The good growth objectives provide an important framework for the Draft London Plan, which seeks to enable significant increases in:
- housing
 - economic growth
 - supporting infrastructure
 - the quality of environment and place.

It aims to do so in a way that best supports improvements to inclusivity, fairness, resilience and health.

- 1.13. Two overarching priorities underpin the Draft London Plan:

- delivering more homes for Londoners
- supporting sustainable economic growth.

These are balanced by the need to: ensure that the city continues to tackle climate change; enhance its environment and green spaces; and improve the health of Londoners.

- 1.14. Making best use of land will be the fundamental principle of the Draft London Plan. This means brownfield land will remain prioritised through 'Brownfield-First Opportunity Areas'. There will also be increased neighbourhood density, including from small sites; and a greater role for mid-rise suburban development. The Draft London Plan also establishes the principle for some managed release of green-belt land by boroughs, where it is sustainably located.
- 1.15. The Draft London Plan is more streamlined than previous Plans; and focuses on the policies that genuinely require a London-wide approach. The streamlining has been achieved by not watering down the high standards that Londoners deserve – but by consolidation, and stripping away policies that are duplicated at other tiers. In doing so, it provides a clear and tailored response to London's specific needs and Mayoral duties, while broadly reflecting the streamlining intent of the new draft National Planning Policy Framework (published for consultation in December 2025). Its aim is to remove unnecessary duplication, and reduce complexity.
- 1.16. The Draft London Plan is supported by a detailed but proportionate evidence base. It has been developed with careful consideration of costs and viability so that it does not increase the overall burden of planning policy requirements on development, while maintaining high standards for Londoners.

- 1.17. The development of the Draft London Plan for statutory consultation has been informed by early engagement (in 2021-24) through the Planning for London Programme; and the non-statutory consultation (in 2025) on the Towards a New London Plan document. This has been further supported by workshops with GLA family officers to discuss policies and key issues; and ensure alignment with other Mayoral strategies and review meetings with relevant Deputy Mayors and Mayoral Advisers.
- 1.18. The Plan has been drafted to ensure that London: is prepared to implement ambitious policies for growth; and has an up-to-date Development Plan in place. As the London Plan statutorily forms part of every local authority's development plan, there is no requirement for the policies to be repeated at the local level before they can be implemented. In several areas, the Draft Plan intentionally establishes London-wide standards and approaches, to remove the need for separate borough standards. In other instances, a local approach is required within the context of the overall policy; the Draft London Plan clearly sets out where this is the case.
- 1.19. It is crucial that all those involved in planning and development in London:
- understand how London's two-tier planning system works
 - do not seek to duplicate policy or evidence unnecessarily; or diverge from key London-wide requirements that are necessary to deliver sustainable growth.

1.20. The structure of the Draft London Plan is as follows:

- **Chapter one – Overview of the Plan and Good Growth Objectives.** This sets out the underpinning objectives; a high-level statement of justification; and a statement of regard to relevant legal requirements. Specifically, it sets out the Draft Plan's approach to addressing housing need; and how this will be met in a sustainable, deliverable way, recognising the scale of London's growth challenge. While the Plan identifies a strategy to realise growth of around 850,000 new homes (government-assessed need) over 20 years, it plans for the delivery of 558,000 in the first decade to 2037. This reflects what is realistically achievable in that period – ensuring a plan-led approach that secures benefits and is supported by necessary mitigations for any impacts from development.
- **Chapter two – Making best use of land and achieving Good Growth.** This sets out the spatial strategy that guides where and how London will grow by:
 - optimising brownfield land
 - supporting mid-rise and well-connected development
 - identifying sustainable opportunities in the green belt
 - aligning growth with infrastructure
 - ensuring high-quality, inclusive and resilient places as the city intensifies.

Planning for the scale and nature of growth envisaged will rely on timely investment in strategic infrastructure – particularly transport; utilities; flood-risk management; social facilities; and green infrastructure.

- **Chapter three – Delivering the homes and neighbourhoods Londoners need.** This sets out how London will plan for and deliver 558,000 homes over the next decade by:
 - supporting affordable and diverse housing types
 - addressing the needs of different communities

- ensuring good design and quality
- ensuring that delivery is viable, sustainable and aligned with wider infrastructure.
- **Chapter four – Growing London’s economy in a way that benefits all.** This sets out the strategic approach to supporting London’s economic growth by establishing how the city will:
 - plan for sufficient and adaptable employment and industrial space
 - safeguard essential infrastructure
 - enable the continued success of cultural, creative and visitor sectors
 - promote affordable and flexible workspace.
- **Chapter five – Creating a greener, healthier, and more resilient city.** This sets out how planning will help London tackle the climate emergency and environmental pressures, embedding the following into the city’s growth and development:
 - net zero-carbon design
 - flood and heat resilience
 - urban greening
 - clean air
 - healthy living.
- **Chapter six – Place visions and place-based approaches.** This sets out how London will manage growth and change across its key places by:
 - prioritising brownfield opportunities
 - supporting well-connected development
 - protecting open spaces and historic assets
 - ensuring that intensification delivers sustainable, inclusive and high-quality environments.

1.21. The Draft London Plan also includes a glossary, and a list of abbreviations. Annexes A to G contain monitoring and spatial locations and designations.

1.22. The following consultation programme is scheduled:

- 16 July 2026: launch presentation led by the Mayor and Deputy Mayor
- July and September 2026:
 - stakeholder-engagement events (local authorities, developers and Londoners) led by the London Plan team
 - participation in ongoing partner and stakeholder meetings
- August 2026 – drop-in sessions on how to respond to the consultation and clarifications (by theme), facilitated by officers.

1.23. In addition, in accordance with the relevant statutory requirements:

- the Draft London Plan and associated documentation (IIA, HRA) will be made available for public inspection at City Hall, and by London local authorities
- copies of all 'representations' (formal comments made on the Draft London Plan) made will be available for public inspection at City Hall
- the Draft London Plan and associated documentation will be made available on the GLA's website
- statutory notices will appear in the London Gazette and the London Evening Standard; these will specify the end date for the consultation (this will be no less than 12 weeks from launch)
- copies of the Draft London Plan and associated documentation will be sent to:
 - the London Assembly and the functional bodies
 - the Secretary of State for Housing, Communities and Local Government
 - every London borough, county and district council adjoining London
 - Natural England
 - the Environment Agency
 - Historic England
 - authorities from the wider South East, where these are not included in the above.

2. Objectives and expected outcomes

- 2.1. Consulting on the Draft London Plan will fulfil the Mayor's statutory obligations to consult as stipulated in the Greater London Authority Act 1999 (GLA Act).
- 2.2. Stakeholders and the public will be able to review the complete Draft London Plan (which the Mayor proposes to publish). This review will help stakeholders to provide fully informed and constructive responses.
- 2.3. The consultation aims to achieve broad and inclusive engagement. It will enable participation from a wide range of stakeholders and communities across London. Specific measures will be in place to maintain accessibility.
- 2.4. Following the consultation, GLA officers will report to the Mayor on the responses received; and identify areas of support, concern or objection for the Mayor's consideration.

3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010 (the Equality Act), the GLA (including the Mayor), as a public authority, must comply with the Public Sector Equality Duty when exercising its functions. This is a duty to have due regard to the need to eliminate discrimination, harassment and victimisation, and any conduct that is prohibited by or under the Equality Act. There is also a duty to advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not. This involves:
 - having due regard to the need to remove or minimise any disadvantage suffered by those who share a relevant protected characteristic, that is connected to that characteristic

- taking steps to meet the different needs of such people
 - encouraging them to participate in public life or in any other activity where their participation is disproportionately low.
- 3.2. The protected characteristics under section 149 of the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, marital or civil partnership status, race, religion or belief, sex, and sexual orientation. Compliance with the duty may involve ensuring people with a protected characteristic are provided with all the opportunities that those without the characteristic would have.
- 3.3. In respect of the Draft London Plan, an Equality Impact Assessment (EqIA) is included in the IIA (Appendix B) and a summary of this is included in the assessments section below.
- 3.4. An assessment of impacts on equality is an integral part of the IIA (Appendix B). A specific assessment objective relates to equality of opportunity, to demonstrate how potential impacts of the Draft London Plan on equality have been considered. A separate EqIA, focusing on potential impacts on groups with the protected characteristics in the Equality Act, can be found in Appendix A of the IIA report.
- 3.5. As set out in the EqIA, the Draft London Plan is generally expected to have positive effects on people with protected characteristics (with the exception of marriage and civil partnership, as this characteristic is only protected in relation to discrimination in the workplace). While the policies in the Draft London Plan do not all directly affect a number of the protected characteristics, where effects are identified, they are mainly positive. The Draft London Plan is therefore considered to be generally compatible with the three main duties of the Equality Act.
- 3.6. Most impacts resulting from 'making best use of land' and 'achieving good growth' policies are positive for protected groups. However, there are some negative climate and environmental impacts that could arise from high-density development if climate-resilience interventions are not integrated. There may be some negative effects associated with increased air pollution from development, particularly in relation to economic growth initiatives and development density. Certain groups may be particularly vulnerable to the impacts of air pollution, such as:
- older and very young people
 - pregnant people
 - Black, Asian and minority ethnic communities (who are more likely to live in areas with poorer air quality)
 - those with certain health conditions.

The relevant policies include measures seeking to protect amenity, which should provide mitigation for these potential negative effects. The 'creating a greener, healthier, and resilient city' policy primarily benefits communities that are disproportionately affected by pollution and the adverse impacts of climate change. These groups include:

- children
- older people
- Black, Asian and minority ethnic communities
- people who are pregnant
- people with disabilities.

- 3.7. Changes provided for by the Draft London Plan are justified and proportionate, notwithstanding any adverse impacts.
- 3.8. No equality impacts have been identified arising from the withdrawal of the Draft Fire Safety LPG. This is because this draft guidance relates to current London Plan policy, which remains in place until a new London Plan replaces it. The new London Plan will have a fire safety policy. The Draft Fire Safety LPG was consulted on in 2022; but was never formally adopted as an LPG. The equalities assessment for the Draft London Plan concludes that its fire safety policies will:
- enhance safety and sense of security
 - ensure that risk factors are appropriately addressed
 - have positive effects on protected characteristics of age, disability and pregnancy.
- 3.9. The GLA will seek to remove barriers, in the consultation process, that prevent those with protected characteristics benefiting from participation. It will achieve this by:
- providing accessible consultation documents – including a summary and an Easy Read format; and, where necessary, British Sign Language formats
 - promoting the consultation widely across London; and enabling participation via different routes (e.g., accessible events)
 - giving consultation respondents the opportunity to highlight any accessibility or equality issues they foresee, regarding the process of developing the new Plan and drafted policies
 - considering requests for documents to be made available in other formats, and translated into other languages, on a case-by-case basis.
- 3.10. Providing a formal and accessible opportunity to comment on the Draft London Plan will ensure that views are captured, published and considered in accordance with statutory requirements.

4. Other considerations

Key risks and issues

- 4.1. Risks associated with the decision to publish and consult on the Draft London Plan are set out in the table below:

Risk	RAG rating	Mitigation
<i>Programme:</i> Delays in meeting the key consultation milestone in line with the programme would impact overall London Plan programme delivery – including progression to Examination in Public; and adoption of the London Plan within this Mayoral term.	Red	An estimated programme to 2028 has been developed, to ensure the process runs as efficiently and effectively as possible. GLA officers are working with the government and the Planning Inspectorate, with an aim to minimise risks and delays as much as possible. Clear project management, adequate resourcing, and early engagement with statutory consultees will help keep the programme on track.
<i>Strategic planning continuity:</i>	Red	A decision to proceed with the statutory consultation will allow stakeholders to provide

Risk	RAG rating	Mitigation
Without agreement to proceed with consultation, the next statutory stage of the London Plan review cannot progress. This could result in delays to the plan-making timetable; and increase the risk that elements of the existing policy framework become out of date before updated policies can be adopted.		formal representations to strengthen the Plan; and ensure it reflects current challenges and opportunities.
<i>Policy consistency:</i> Some elements of the Draft London Plan are not aligned with the new draft National Planning Policy Framework (NPPF) (published for consultation in December 2025). This may be the case where the Draft Plan seeks to address London's unique circumstances and built environment – including the deliverability of development; and the pursuit of sustainable growth within the capital's spatial, economic and environmental contexts. As a result, these policies could be challenged through representations made on grounds of soundness.	Red	With the support of a robust evidence base, there has been a comprehensive review of all draft policies against both the current and emerging draft NPPF. This is to ensure alignment, where considered appropriate. This shows how national policy has shaped the Plan's strategy and policy choices – ensuring the Plan can be defended as sound and consistent with the principles of the NPPF. The Plan's consistency with the NPPF will continue to be assessed after the final version of the NPPF has been published. This recognises that its provisions may differ from those set out in the draft currently under consideration. Engagement with MHCLG and statutory consultees will identify and resolve potential areas of conflict before consultation. An examination in public will continue to take place. Where there is divergence from the national policy position, a clear and proportionate rationale has been provided. This has been informed by a careful consideration of the measures necessary to support sustainable development within the London context, with reference to the Mayor's strategic duties (as set out within the legal section of this decision). These considerations should enable the Plan to be defended as sound.
<i>Deliverability:</i> Some policies in the Draft London Plan, particularly those relating to housing delivery, may be difficult to implement, given current economic conditions. Market uncertainty (alongside ambitious housing targets, infrastructure dependencies, and viability pressures) means that boroughs and developers may struggle to bring forward schemes at the scale, pace and affordability levels required. If policies do not reflect these market realities, lack sufficient flexibility or are not supported by realistic delivery	Red	There has been robust viability-testing of policies, including cumulative impact assessments, to ensure they are deliverable across a range of market conditions. The scale of delivery required is ambitious, and will require wider support (as set out in chapter one of the Draft Plan) – including affordable housing grant and infrastructure investment. Officers have documented how viability considerations have shaped policy choices to demonstrate soundness.

Risk	RAG rating	Mitigation
assumptions, there may be inconsistent delivery across London; and an overall failure to meet London's housing needs. This undermines the Plan's effectiveness; and could be challenged through representations made on grounds of soundness.		Engagement with stakeholders will further test assumptions and identify if/where policy requirements may need refinement. The evidence base is proportionate and transparent; and will be updated as necessary to reflect market changes. The Draft Plan aims to provide flexible policies and mechanisms to support deliverability, while maintaining policy intent.
<i>Stakeholder challenge:</i> There may be stakeholder push-back, including political challenge, on policies in the Draft London Plan – such as those relating to the green belt and small sites. This could create pressure to change policies that are necessary to deliver sustainable growth and meet housing needs.	Red	The London Plan is a statutory planning document, setting out the policies required to deliver housing and infrastructure in the most sustainable way. A clear and robust rationale for each policy is provided. These are grounded in evidence and the principles of sustainable development. Messaging and engagement materials will be designed to clearly explain the necessity and evidence base for these policies. The GLA will seek to maintain transparency throughout the consultation, to build understanding and confidence in the Plan's approach.
<i>Operational and resource:</i> If publication and consultation do not proceed in the required timeframe, inefficiencies may arise. Additional or higher costs may be incurred in the future, due to increased workloads for existing staff; and/or the need to procure further work to address issues created by delay (such as a compressed programme). This would require work to be undertaken at pace including the timely management and analysis of representations.	Red	Regular reviews and governance arrangements will be in place to monitor operational risks, resource pressures and delivery challenges. A project plan is in place to support the timely management and analysis of representations that will be received. This will ensure accuracy, transparency and timely completion of the most complex and demanding element of the consultation process. And advance resourcing arrangements are in place should the volume of responses be higher than expected.
<i>Consultation approach:</i> Running the statutory consultation over the summer risks creating a perception of inadequate engagement; and may limit stakeholders' capacity to review and respond to a substantial replacement London Plan. Any failures to consult appropriately could also bring legal risks.	Amber	A robust process for consultation has been established. This will ensure that an appropriate consultation is undertaken in accordance with the Mayor's statutory duties. The consultation period will be extended beyond the statutory 12 weeks, to 13 weeks. This will ensure stakeholders have adequate time to prepare meaningful responses. This means the consultation will run throughout September, and into October. Local authorities and key partners will receive early notice of the consultation launch, to allow for preparation of resourcing.

Risk	RAG rating	Mitigation
		Targeted engagement sessions will be offered to support understanding of policies, and explain how to make a representation. Accessible consultation documents will be provided – including a summary and an Easy Read format; and, where necessary, British Sign Language formats. Clear communication channels will be maintained using platforms such as London.gov; Engagement HQ and Talk London; sector briefings; and public events. Delivery will also be supported by media briefings, partner communications and social media. Paid activity will include statutory notices. The consultation will be evaluated through analysis of website and platform traffic; email and social media performance; consultation submissions; and media coverage. Engagement effectiveness will be assessed by the volume and diversity of responses; participation across Talk London and Engagement HQ; attendance at events; and the geographic spread of participants.
<i>Reputational:</i> Ineffective consultation – including not reaching all relevant groups – could create a perception of poor engagement or negatively impact confidence in the GLA’s capability, processes and governance. This could result in loss of trust from stakeholders and increase scrutiny at the Examination in Public.	Amber	A clear programme for consultation and publication is in place. This is supported by strong internal governance and regular oversight through established decision-making routes. There has been early engagement with key stakeholders, supported by a ‘no surprises’ approach with local authorities, and clear, transparent communication on timelines. The Draft London Plan is underpinned by a comprehensive and proportionate evidence base. Policies have been subject to wide-ranging review to ensure robustness ahead of consultation.

Links to Mayoral delivery plans and other strategies and priorities

4.2. The London Plan is the overarching document that integrates the spatial aspects of the other statutory Mayoral strategies. In developing the Draft London Plan for consultation, GLA officers have had regard to the Mayor’s statutory strategies, to ensure alignment and consistency across related areas. These include:

- transport
- housing
- environment
- economic development
- health priorities.

The Draft London Plan also reflects the priorities set out in the London Growth Plan. This was jointly developed by the GLA and London Councils, with respect to its second priority (after housing delivery) of supporting economic growth priority.

4.3. This Draft London Plan also supports the outcomes set out in the Mayoral programmes' delivery plans, including:

- Building More Homes
- Making Best Use of Land
- Boosting London's Growth Sectors
- Helping Local Economies to Thrive.

The Draft Plan is central to setting out the policy direction to support the delivery of new housing across London. It also underpins sustainable development, and the distribution of growth across the city.

Consultations and impact assessments

Consultations

4.4. From 2021, the Planning for London programme gathered early evidence on the views of Londoners and interested parties. This work identified issues and options that the London Plan review could consider in more detail. The engagement programme incorporated multiple routes for Londoners to share their views, including:

- Talk London
- the Planning for London online portal
- deliberative events
- stakeholder events
- a Design Future London challenge for young people
- calls for evidence.

4.5. In spring 2025, consultation on 'Towards a new London Plan' (a high-level direction-of-travel document on potential policy ideas for the next London Plan) ran for six weeks (from 9 May until 22 June). Responses were reviewed, and have been used to inform the development of the Draft London Plan.

4.6. The Easy Read version of 'Towards a new London Plan' went out for consultation from September to November 2025. Two engagement sessions were held in October (in person at City Hall) and November (online). The events were facilitated by Publica CIC and Inclusion London. The feedback and input that came through this engagement has also been reviewed, and used to inform the Draft London Plan.

4.7. A non-statutory consultation summary report will be published alongside the Draft London Plan. This report has been prepared to support transparency on the consultation process rather than as a formal requirement. It will provide further detail on the consultation events undertaken for the Planning for London Programme and Towards New London Plan, and explain how the preparation of the Draft London Plan has been informed by the comments received.

- 4.8. The draft IIA Scoping Report was published for consultation from December 2025 to February 2026. Comments have been fed into the development of the IIA. The IIA includes equality assessments, in accordance with best practice and the Mayor's public sector equality duty.

Integrated Impact Assessment

- 4.9. In preparing or revising the London Plan, the Mayor is subject to a range of statutory duties (set out in the legal section of this decision).
- 4.10. The GLA has adopted an integrated approach, to show how these statutory duties have been considered, in the form of an IIA (at Appendix B). The IIA approach addresses the Mayor's legal duties to carry out a comprehensive assessment of the new London Plan, and its proposed policies, with one integrated process. The IIA includes:
- a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)
 - a Health Impact Assessment
 - a Community Safety Impact Assessment
 - an EqIA.

Information from the parallel workstream of the HRA has informed the IIA; but this is reported separately.

- 4.11. The SEA Regulations require statutory consultation bodies (the Environment Agency, Historic England and Natural England) to be consulted "when deciding on the scope and level of detail of the information that must be included" in the IIA Report. In accordance with this requirement, the IIA Scoping Report was subject to consultation with the statutory bodies between 19 December 2025 and 13 February 2026. The amendments arising from this consultation are reflected in the IIA Report, which accompanies the consultation on the Draft London Plan.
- 4.12. The IIA is an iterative process informing the London Plan as it develops. Through this process, the potential significant effects of emerging policies on social, economic, environmental, equality, health and community safety factors are identified and assessed; and mitigation opportunities are proposed. The IIA informs decision-makers about the environmental and sustainability consequences of the proposed London Plan policies that can then be considered alongside financial, technical, political and other factors.
- 4.13. The GLA appointed Land Use Consultants as an independent consultant, to provide technical advice and support to the London Plan team undertaking the IIA.
- 4.14. The IIA shows that the Draft London Plan provides a comprehensive and robust framework for guiding London's growth over the next 20 years, in a way that is more sustainable, inclusive and resilient. Overall, it shows that the Draft London Plan has strong potential to deliver significant positive outcomes – particularly in supporting housing delivery, economic growth, and improved health and wellbeing. It does this through an emphasis on optimising land use; promoting the good growth principles; and enhancing access to infrastructure and services. At the same time, the Draft Plan provides a clear strategic approach to tackling climate change; promoting biodiversity net gain; and improving environmental quality. In this way, it is helping to build London's long-term resilience.
- 4.15. However, the IIA also identifies that the scale of growth required – particularly the need to deliver substantially higher levels of housing – will inevitably result in some potential adverse effects. These include pressures on greenfield land, biodiversity, infrastructure capacity and local character; and risks of exacerbating inequalities if growth is not carefully managed. The IIA highlights the importance of mitigation provided by many of the draft policies; effective implementation; and ongoing monitoring. These measures will ensure that negative effects are minimised, and benefits are maximised

Habitats Regulation Assessment

4.16. The legal requirement for an HRA is set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The purpose of an HRA is to:

- assess the impacts of a land-use plan against the conservation objectives of a European site
- ascertain whether it would adversely affect the integrity of that site – either alone, or in combination with other plans or projects.

The HRA process will determine whether there are any detrimental impacts on Special Conservation Areas (SAC), Special Protection Areas or Ramsar sites (collectively known as Habitats Sites).

- 4.17. The HRA process is ongoing and iterative; and has been used to inform policy preparation. The HRA of the Draft London Plan is reproduced as Appendix C to this decision form. It identified seven Habitats Sites within the plan area, and another eight outside the plan area, where potential impact pathways were assessed as being present. Following screening for likely significant effects, six policies in the Draft London Plan were taken forward for appropriate assessment. The potential impact pathways considered during appropriate assessment were recreational activity and urbanisation; air pollution; and water resources (quality and quantity).
- 4.18. Following appropriate assessment, it could be concluded that there are no adverse effects on integrity on the majority of the Habitats Sites. The identified impact pathways could have a detrimental impact on some sites; in these cases, either changes to the Draft London Plan were recommended or additional information was requested. Regarding recreational activity and urbanisation, changes to Policy GHR8 Accessible green space were recommended. This was to ensure sufficient provision for green space, to prevent increased recreational use of Epping Forest SAC.
- 4.19. Regarding air pollution, for Epping Forest a conclusion of ‘no adverse impacts’ could not be determined at this stage. Additional information is required from ongoing air-quality modelling work before an appropriate assessment can be completed. This work is expected to be completed in summer 2026. Changes to Policy GHR10 Air Quality were also recommended, make explicit reference to Epping Forest SAC, and the requirement for local authorities to deliver air-quality and public-transport improvements (these are to ensure new developments do not have an adverse air-quality effect on Epping Forest SAC). The HRA concludes that the Draft London Plan will not result in a negative effect through the air-quality impact pathway on Wimbledon Common SAC. However, additional air-quality modelling is also being conducted for this SAC, to inform the local authority plan-making process and the HRAs of relevant Local Plans.
- 4.20. The IIA and HRA will be published with the Draft London Plan, on 16 July 2026, for consultation.

Conflicts of interest

- 4.21. No officer involved in the drafting or clearance of this MD, or the preparation of the Draft London Plan, is aware of any conflicts of interest that might arise as a result of the publication.

5. Financial comments

- 5.1. Approval is being sought to spend up to £250,000 on public consultation on the Draft London Plan; and associated requirements (including printing the Plan, the IIA and HRA). The proposed spend is from the London Plan budget, held within the Making Best Use of Land programme, made up of both GLA resources and reserves (revenue grants unapplied). This is a planned use of reserves as set out in the GLA Mayor budget for the 2026-27 financial year.
- 5.2. All appropriate budget adjustments will be made.

6. Legal comments

Statutory framework

- 6.1. The Mayor is required to prepare and publish a spatial development strategy (the London Plan) under section 334 of the GLA Act. The London Plan must:
- include the Mayor's general policies in respect of the development and use of land in Greater London
 - deal only with matters which the Mayor considers to be of strategic importance to Greater London.

In making that determination, it is immaterial whether or not the matter affects the whole of Greater London.

- 6.2. The Mayor has a duty, under section 340 of the GLA Act, to keep this strategy under review. He can, under section 341 of the GLA Act, prepare and publish a replacement London Plan at any time.

Matters to which the Mayor must have regard

- 6.3. Under section 342 of the GLA Act, when considering the proposed replacement London Plan, the Mayor must have regard to any regional planning guidance issued by the Secretary of State – so far as it relates to an area that includes or adjoins Greater London – and such other matters as they may prescribe.
- 6.4. Section 41 of the GLA Act sets out the Mayor's general duties in respect of all of his strategies. Obligations specific to the London Plan are contained in Part VIII of the GLA Act; and the Town and Country Planning (London Spatial Development Strategy) Regulations 2000 (the Regulations).
- 6.5. In replacing the London Plan the Mayor must have regard to
- the GLA's principal purposes, as set out in section 30 of the GLA Act – including promoting:
 - economic development and wealth creation
 - social development
 - the improvement of the environment in Greater London
 - the effect that the London Plan will have on various themes including health, health inequalities, sustainable development and climate change
 - the need to ensure consistency with national policies, the UK's EU obligations, and such other international obligations the Mayor is notified of by the Secretary of State
 - the resources available to implement the London Plan
 - the desirability of promoting and encouraging the safe use of the River Thames to provide passenger transport services, and transport freight
 - the need to ensure consistency with the Mayor's other statutory strategies – including a statement dealing with the general spatial development aspects of the Mayor's other strategies, such as those dealing with:
 - transport

- the environment
- economic development
- housing
- culture
- health and health inequalities

- prescribed matters under regulations made pursuant to section 342 of the GLA Act, including the national waste management plan; and matters relating to:
 - the prevention of major accidents
 - the limitation of their consequences
 - the need to maintain appropriate separation distances between establishments and sensitive uses; and to minimise risks from hazardous substances.

6.6. The Mayor must also comply with statutory duties relating to community safety under the Police and Justice Act 2006; and the Crime and Disorder Act 1998. The GLA must have due regard to the likely effect of the exercise of its functions on, and the need to do all it reasonably can to prevent, crime and disorder. Community-safety impacts of the Draft London Plan have been assessed as part of the IIA.

Assessment

6.7. An IIA and an HRA have been undertaken for the Draft London Plan, as detailed at section 4 (above). These examine the likely impacts of the proposed policies; and are intended to meet the legal requirements regarding SA/SEA, under the Environmental Assessment of Plans and Programmes Regulations 2004; and Regulation 102 of the Conservation of Habitats and Species Regulations 2017 (which implements Article 6(3) of the Habitats Directive (92/43/EEC)). This requires an HRA to be undertaken in respect of any plan or project that (either alone, or in combination with other plans or projects) would be likely to have a significant effect on a European Site; and is not directly connected with the management of the site for nature conservation.

6.8. The Mayor and GLA are also subject to the public sector equality duty, as set out in section 149 of the Equality Act. This duty is addressed in section 3 of this decision, and the EqIA.

6.9. The IIA, the EqIA and the HRA are all appended to this decision. They will be made publicly available during the consultation.

Consultation, public inspection and statutory notices

6.10. The proposed consultation, exercise in respect of the Draft London Plan, must be carried out in accordance with the statutory requirements. Section 42 of the GLA Act provides that, when revising any mayoral strategy, the Mayor must consult:

- the London Assembly
- the GLA's functional bodies
- each London Borough Council
- the Common Council of the City of London
- any other body or person whom he considers it appropriate to consult; this includes:

- voluntary bodies, some or all of whose activities benefit the whole or part of Greater London
- bodies that represent the interests of different racial, ethnic or national groups in Greater London
- bodies that represent the interests of different religious groups in Greater London
- bodies that represent the interests of persons carrying on business in Greater London.

6.11. Section 335 of the GLA Act, and Regulation 7 of the Regulations, set out further consultation and public participation requirements specific to the London Plan. These include further persons/bodies that must be consulted, as detailed at section 2 (above). This includes the requirement to make the Draft London Plan and IIA – including the Sustainability Appraisal of how the Draft London Plan contributes to the achievement of sustainable development, available for inspection at City Hall and such other places as the Mayor considers appropriate. Local planning authorities for each London borough also need to make these documents available for inspection at their principal office. The Mayor is required to give them such notice and documents as they require to comply with this duty.

6.12. The Mayor is also required, as soon as reasonably practicable (after he makes copies of the proposed Draft London Plan and IIA available for inspection), to place a statutory notice setting out the consultation period. This must run for no less than 12 weeks, ending on the date given in the statutory public notice. As the consultation is taking place over summer, this period has been extended to 13 weeks.

Delegation

6.13. Pursuant to section 38(1) and (2) of the GLA Act, the Mayor can delegate authority to the Assistant Director for Planning & Regeneration to approve and authorise any minor editorial or factual amendments to appendices A, B and C, prior to publication.

7. Planned delivery approach and next steps

7.1. The proposed timetable for the development of the new London Plan is set out in the table below. Certain activities (*) are outside of GLA's direct control. As soon as the Planning Inspectorate confirms the dates, the GLA will proceed in line with the programme.

Activity	Timeline
Consultation on Draft London Plan	16 July to 15 October 2026
Manage responses and propose modifications for sign-off	Winter/spring 2027
Submit the Draft London Plan to the Secretary of State	Spring/summer 2027
Prepare for examination in public	Summer/autumn 2027
Examination in public*	Autumn/winter 2027
Inspector's report*	Winter/spring 2028
Mayor sends statement of intention to publish to Secretary of State	Winter/spring 2028
Secretary of State sign off*	Winter/spring 2028
Laid before London Assembly	March 2028
Formal publication of the new London Plan	March 2028

Appendices and supporting papers:

- Draft London Plan (Appendix A)
- Integrated Impact Assessment (which includes the Equalities Impact Assessment) (Appendix B)
- Habitats Regulation Assessment (Appendix C)

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

Strategic Programmes

Does this decision seek approval for activity falling within the remit of a programme delivery plan? YES

If YES, which programme/s does this fall within: Making Best Use of Land

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason: To ensure the draft new London Plan is published on the agreed launch date and not in advance

Until what date: (a date is required if deferring) 16 July 2026

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form? NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Marissa Ryan-Hernandez has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Lucinda Turner has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

Mayoral Adviser:

Jules Pipe has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Mayoral Delivery Board

This decision was agreed by the Mayoral Delivery Board on 29 June 2026.

CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature



Date 2 July 2026

pp Peter Sebastian, Assistant Director, Financial Services
on behalf of Fay Hammond

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor

Signature



Date 1 July 2026

