Response to Draft London Plan consultation

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Contents

Foreword 3
2. Making best use of land and achieving Good Growth 5
MBUL1 Spatial strategy 5
MBUL2 Optimising the use of land and site capacity & MBUL3 Tall buildings 7
MBUL5 Sustainable transport to enable London's growth 8
MBUL6 High quality design for a growing, changing city & MBUL8 Inclusive design 11
MBUL7 London's heritage 12
MBUL9 Healthy streets and public realm 13
3. Delivering the homes and neighbourhoods Londoners need 16
HN1 Increasing London's housing stock 16
HN2 Protecting and reshaping housing 19
HN3 Delivering affordable housing 21
HN4 Gypsy and Traveller accommodation 24
HN6 Build to Rent 25
HN7 Housing size mix 27
HN9 Accessible housing 28
4. Growing London's economy in a way that benefits all 29
GLE1 Sufficient and appropriate employment space (and GLE5, GLE7) 29
GLE3 Data centres, GLE11, GHR1, GHR2 29
GLE9 Aviation 31
5. Creating a greener, healthier, and resilient city 32
GHR3 Whole life-cycle carbon 32
GHR5 Flood risk and drainage 33
GHR11 Cycle and car parking 34
6. Place visions and place-based approaches 37
PV1 Brownfield First Opportunity Areas (BFOAs) 37
PV3 Town centres and high streets 38

PV6 Metropolitan Open Land (MOL) 39
PV7 Sustainable development and enhancement of the Green Belt 39

Foreword

Being a London politician means being confronted with a constant chorus of housing horror stories. There is simply no London community or neighbourhood untouched by the runaway financialisation of housing in our city.

North, East, South and West. Council tenants to private renters. Homeowners concerned for their children. Children worried about their pensioner parents. Everyone knows someone hit by the extortionate price of living in this city. And as a private renter of over a decade here I know it personally.

The London Plan will be a leading part of how we respond to this emergency. It is the Mayor's second opportunity to set a plan and deliver the social housing our city so urgently needs. His previous plan was in some ways an improvement on what came before, but ultimately failed. We are at risk of this attempt failing to deliver too.

Unlike last time, the Mayor's party is now also in control of central Government. This should be an unprecedented opportunity to reshape our approach to housing. To roll back the poisonous legacy of selling out of the city to developers.

This plan does not do that. Instead, it continues the same developer-led model and super charges it. It is weaker on affordable housing at a time when need has never been higher, while proposing we chew up lots of land to build expensive flats in new luxury towers.

This approach has never worked, and in this challenging environment with high costs and falling demand for market housing, will continue to not work. Building for commercial viability and not need will come with a huge, unnecessary costs, for our communities and the planet.

I am inspired by the community crowdsourced alternatives for a London plan that focus on the needs of Londoners above all. Just Space's alternative London Plan for a caring city, built by London's grassroots community model, should be an inspiration. It is a document shaped by far more community consultation than the London Plan. My recommendations will mirror many made by the experienced and knowledgeable community groups at the cliff edge, confronting this housing crisis head on.

Campaigning groups have also shared their views of the draft London Plan, particularly around transport, which have been used to inform my response as well. The weakening of the provision of for free, fully accessible, inclusive, toilets available 24 hours a day, is a case in point and a real failure of the draft London Plan. While Disabled people's organisations have raised concerns that accessibility, inclusion and wheeling are not fully recognised within the policy framework.

Similarly, the lack of reference in the draft London Plan to the targets in the Mayor's Transport Strategy (MTS) is a big oversight, particularly given the modelling evidence that has been used, which predicts a 10 per cent increase in highways trips by 2036. The new London Plan should respond to this forecast and strengthen its policies to encourage sustainable travel modes and reduce private car use.

Surely it also time for the Mayor to produce new Transport and Environmental Strategies, both statutory documents. The new London Plan will run to 2046, as opposed to 2041 for the current MTS, while the implementation plan for his Environment Strategy only goes up as far as 2023.

Nor do these strategies refer to the Mayor's goal for London to be Net Zero by 2030, which should strongly inform the actions within them.

My response to this plan is informed by the work of not only the many NGOS, charities and interest groups I have engaged with, but also by the work of colleagues at the London Assembly,

It is by no means an exhaustive critique of the Plan but reflects key areas that residents and experts have said to me are some of the key areas of concern.

My headline recommendations to the Mayor are:

- set binding strategic targets for social housing delivery across London, allocated by borough;
- revisit the fragile evidence base on the need for one and two-bed market rate homes, at a time when the market is collapsing;
- reinstate affordable housing targets in sites of all types and sizes, and set stronger policies on accessible affordable housing;
- be cautious of embracing the private build to rent model, which risks simply fuelling the runaway financialisation of housing;
- provide genuine protections for Londoners against displacement of all kinds and concrete mechanisms for communities to influence the planning process;
- ensure accessibility, sustainability and safety are at the heart of all transport and infrastructure planning;
- do not let environmental standards be traded away in pursuit of growth and viability, the Draft Plan fails to set ambitious enough standards on carbon, water and energy generation;
- explicitly refer to his Transport Strategy, accessibility for Disabled people and reinstate the existing policy for public toilets.

2. Making best use of land and achieving Good Growth

MBUL1 Spatial strategy

I am concerned about a strategy of spatial development developed around a 558,000 unit housing target that is viability rather than need led, and does not consider tenure or size of homes. My response to Policy HN1 takes issue with this overarching target, and its lack of connection to deliverability or need. My response argues this 'build, baby, build' approach will not necessarily improve outcomes for Londoners and is likely to be incredibly harmful.

MBUL1 makes plain some of the more direct sacrifices of prioritising these twin goals (of growth and total supply) at all costs. Part A(5) notes that development plans should: "benefit overall strategic site delivery which may include agreeing exceptions to the prioritisation [of affordable housing provision and public transport improvements]", while B(8) says local plans should: "optimise value generation and delivery through phasing, use, layout, housing mix and other expectations (including Community Infrastructure Levy (CIL) rates) that are carefully evaluated for their cumulative delivery impact." This approach is justified in paragraph 2.17, which notes: "plan-making authorities should be mindful in the round of cumulative impacts on viability and there should be a proportionate and prioritised approach that avoids undermining delivery."

In other words, desperately needed affordable housing and infrastructure investment are considered a burden on new housing development, rather than an essential part of it. These 'burdens' are already traded away at the viability testing stage by experienced and well-resourced developers. Making allowances for the loss of this vital public infrastructure within the London Plan is a considerable concession away from strategic planning and towards the interests of business. Given the extensive housing need identified in the Strategic Housing Market Assessment (SHMA), this approach is evidently not consistent with the Plan's Good Growth principles, especially 'making good use of land' and 'delivering the homes and neighbourhoods Londoners need'.

MBUL1 also adopts a concerningly narrow definition of infrastructure. Part A(3) calls on development to: "ensure infrastructure sufficiency in respect of growth and wider good growth needs, with particular reference to the strategic infrastructure requirements set out in B(5)." Nonetheless, social infrastructure is not mentioned explicitly and B(5) does not recognise social infrastructure as part of the 'strategic infrastructure' mix that should be planned for within local plans.

Social infrastructure comes in many forms – like community spaces, social value businesses, affordable childcare facilities and public play-space – and is instrumental to ensuring neighbourhoods are inclusive of a diverse set of people and their needs. This draft plan has dispensed with the Good Growth principle GG1 from the last plan, 'Building strong and inclusive communities', which said planners should: "provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation as London's."[1] This Draft Plan has also dropped an entire chapter on social infrastructure.[2]

[1] London Plan 2021. Mayor of London, p.14.
[2] London Plan 2021. Mayor of London, pp. 215-238.

As community groups have argued, GG1 was not enough under the current London Plan to improve social infrastructure and stop community disintegration.[3] This is not a reason for ditching this policy, but for strengthening it throughout the plan. This is particularly true given this Plan's ramping up of its housing delivery targets and the resultant turning out to previously less developed areas of London, including on and around the Green Belt. As well as being an end in itself and part of a desirable vision for the city we want to live in, social infrastructure is integral to the ambitions for growth embedded in this plan, not an obstacle to it.

The London Plan should:

- amend B(5) to mention of the social infrastructure necessary to ensure inclusive, thriving and resilient communities, which works to reduce inequalities, making reference to the community coproduction necessary to achieve this;
- add A(6) to include "involve and integrate with existing communities, including by supporting the social infrastructure necessary for coherent, thriving and inclusive local communities";
- remove reference to the trade-offs of affordable housing and social infrastructure in A(5) and B(8);
- add reference in Part B on involve community coproduction and resident involvement.

[3] Protect our Places (POP) evidence in response to Towards a New London Plan: Consultation on the next London Plan. Latin Elephant, Protect our Places Coalition, June 2025, pp.5-6, https://latinelephant.org/wp-content/uploads/2025/07/London-Plan-Consultation-.pdf

MBUL2 Optimising the use of land and site capacity & MBUL3 Tall buildings

The optimisation framework is a reasonable guide for increasing density in outer London, but neither MBUL2 nor MBUL3 restrain densities so do not respond to the problems that come from building tall in inner London.

As MBUL2 does, prescribing a set of minimum densities and indicative heights is important for suburban London. Much of outer London is very low density, especially compared to our international counterparts. The optimisation framework necessarily links this task to public transport access (albeit, as described in the London Assembly Transport Committee's response to this consultation, the Sustainable Access Measure (the SAM) has major methodological problems).

But the optimisation framework is not suited to addressing the problems associated with building tall, which primarily impact inner London. Much of inner London would receive the highest SAM scores, meaning developable sites would exhaust the optimisation framework and be covered by MBUL3. But, like MBUL2, MBUL3 does not place hard upper limits on densities or heights. It will not counter the tendency to keep building higher in inner London, and the problems associated with it.

Recent London Assembly Planning Committee reports have outlined some of the negative impacts of high-rise developments, and the relative merits of mid-rise development as a default housing typology across all areas of London.[4] Sensible neighbourhood-wide planning for mid-rise development can produce similar densities to high-rise. Mid-rise is better at creating liveable local communities and is considerably more desirable than high-rise living. There is also a massive environmental cost of building tall and sustaining these buildings, which is exponentially higher than mid-rise.

Tall buildings are also much costlier to run. This often means it is difficult to provide social housing in these buildings.[5] Leaseholders and tenants – including of supposedly 'affordable' housing products like shared ownership – can end up trapped in unaffordable homes as maintenance costs keep rising.[6] There is no consideration in MBUL3 of how tall buildings will only meet a very narrow pool of identified housing need, nor the impacts on sustainable transport infrastructure. This is why upper limits on density in a given area are important, as a range of building heights are required to meet local need.

The general permissibility of tall buildings in planning also steadily increases land values. This has been a major contributing factor to the rise of speculative development and unaffordable

[4] Between skyscrapers and semis: London's missing mid-rise housing. London Assembly Planning Committee, March 2026, https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-work/london-assembly-publications/between-skyscrapers-and-semis-londons-missing-mid-rise-housing. Do tall buildings work in London? London Assembly Planning Committee, April 2025, https://www.london.gov.uk/sites/default/files/2025-05/Do%20tall%20buildings%20work%20in%20London.pdf.

[5] Alternative London Plan for a Caring City. Just Space, p.20, https://justspace.org.uk/wp-content/uploads/Justspace_Alt_Plan-2026.pdf

[6] "Worry and stress": life as a leaseholder in London. London Assembly Housing Committee, June 2025. https://www.london.gov.uk/sites/default/files/2025-06/Housing%20Committee%20-%20Leasehold%20report%20-%20FINAL.pdf

housebuilding in London, plus the tendency to keep building higher.[7] As land prices rise, it becomes harder to build any mid-rise developments. And local authorities and housing associations who want to engage in direct housing development are priced out of the land market altogether.[8] Meanwhile, private developers know that the viability process will cover the costs of land purchase.[9] All this is especially concerning given those local authorities covering areas with the highest land prices generally have populations with higher housing need. This policy as it stands risks making delivery against identified housing need much harder, despite its promises of additional density.

Disabled people's organisations, such as Inclusion London, have also raised concerns about the lack of mention of accessibility, specifically Criterion B(4)(i) which requires buildings of 30 metres and above to be of 'exemplary design and architectural quality'. They say that the criteria do not explicitly require exemplary design to include inclusive design or address the particular implications of building at height for emergency evacuation. Decisions about the layout of a tall building, including its cores, lifts, vertical circulation and evacuation arrangements, are fundamental design decisions that need to be considered from the outset.

The London Plan should:

- set and enforce strict upper limits on density, which relate to housing need, creating a genuine presumption of mid-rise development across London;
- pay particular attention to the implications of building at height for inclusive design and emergency evacuation, including reliance on vertical circulation, lifts and evacuation arrangements.

MBUL5 Sustainable transport to enable London's growth

I was deeply concerned to notice that some of the Mayor's key transport policies are not referenced in this section. One of the significant targets in the Mayor's Transport Strategy (MTS) is that 80 per cent of journeys in London should be made by walking, cycling or public transport by 2041.[10] This demands a huge modal shift out of private cars and into more sustainable transport, which can only be managed by enabling walking, cycling and public transport to be a safer, more accessible and convenient mode of travel. This is key in the design and redesign of London, especially for new housing and neighbourhood upgrades.

There is also no mention of the Mayor's Vision Zero Action Plan 2 (VZAP2), which lays out the

[7] Do tall buildings work in London? London Assembly Planning Committee, April 2025, p.22. https://www.london.gov.uk/sites/default/files/2025-05/Do%20tall%20buildings%20work%20in%20London.pdf.
[8] Assessing delivery, challenges and opportunities of the Mayor's Affordable Homes Programme. London Assembly Housing Committee, January 2026, pp.26-7, https://www.london.gov.uk/about-us/londonassembly/meetings/documents/s120293/05%20Appendix%201%20Housing%20Committee%20-%20Affordable%20Housing%20report.pdf.
[9] Building up not trickle down: The case for need-led housing policy. Shelter (Sam Bloomer, Dr Charlie Berry, Charlie Trew), February 2026, pp.28-32, https://assets.ctfassets.net/6sxvmndnpn0s/4q9RRsKTaXtRTN3FADtIzR/0fba0d15f051f030f27231359bd5d387/Build_Up_Not_Trickle_Down_-_The_Case_for_Need-Led_Housing_Policy.pdf.
[10] The Mayor's Transport Strategy. Mayor of London, 2018 https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy

actions needed to reduce road danger risks to achieve the MTS commitment that all deaths and serious injuries will be eliminated from London's transport network by 2041.[11] Again, the development of new housing sites and redesign of roads and streetscape must be led by the evidence presented in the VZAP2, which explicitly points to: "planning tools such as car-free developments or controlled parking zones help reduce traffic volumes, reducing collisions."

Within the evidence base for the new London Plan there is a modelling of future transport trends, Draft London Plan Strategic Transport Modelling Supporting Evidence. Under the Central Case of this modelling there are significant increases in the use of all modes of transport: "daily travel demand in London is forecast to rise by over 11 per cent from 2023 to 27.6 million daily trips in 2036. Public transport trips increase the most (17 per cent) followed by highway trips (10 per cent) and active travel (6 per cent)."[12]

While I note that the evidence in the modelling says that further interventions are needed to bring these changes in line with the policies of the MTS, I am concerned that Transport for London (TfL) is so easily able to model a significant increase in what is likely to be largely car traffic with a 10 per cent increase in highway trips.

Though the modelling evidence does indicate that some of the existing policies on car restraint are having an impact, this means the Mayor must consider the need for stronger London-wide policies on enabling alternatives to the private car. In terms of car restraint policies, this should mean updating the MTS soon, given the new London Plan will have a later end date (2046 for the horizon of the London Plan versus 2041 for the current MTS). The Mayor must give full consideration to further polices on car restraint such as road user charging, kerbside usage and workplace parking levies as well as the transformative investment needed in new walking, cycling and public transport facilities.

Disabled people's organisations, such as Inclusion London, have raised concerns that accessibility, inclusion and wheeling are not recognised within the policy framework. Specifically, that they are not consistently carried through into the operative requirements governing how transport challenges are evidenced, interventions are identified and prioritised, development proposals are assessed, and traffic-management interventions are planned. Without these areas covered, Disabled Londoners will continue to experience significant barriers to active travel, such as inaccessible pavements and crossings, missing dropped kerbs, inaccessible cycling and bus infrastructure and a lack of step-free public transport.

I am also worried about the lack of support for car clubs in London in the Draft Plan. Evidence collected by CoMoUK reflected the appetite for car clubs among Londoners, following the closure of London's largest car share club ZipCar. This closure has left a huge void in the availability of car shares and has the potential for people who do need to take private car journeys to be pushed into expensive car ownership, rather than being able to use a private vehicle only when they really need to. Nine per cent of former Zipcar users said that they had already bought or leased a car because Zipcar is no longer available, and 55 per cent stated that

[11] Vision Zero action plan 2: Taking forward the Mayor's Transport Strategy. Mayor of London and TfL, 2026 https://content.tfl.gov.uk/vision-zero-action-plan-2.pdf

[12] Draft London Plan Strategic Transport Modelling Supporting Evidence: Interim, TfL, July 2026, https://www.london.gov.uk/programmes-strategies/planning/london-plan/next-london-plan/london-plan-evidence

they are now considering buying or leasing a car.[13] The lack of car clubs will therefore negatively affect the MTS targets which aims to reduce private car ownership and use.

Last year, the London Assembly Transport Committee recommended that the London Plan should: "recognise the important part that car clubs can and should play in London's transport mix. This should include support for car clubs by recognising them as an option that enables people to reduce their car use or give up their private car."[14] Doing so would help boroughs deliver the Mayor's transport objectives more consistently and ensure the London Plan provides the policy framework needed to support lower-car neighbourhoods, higher-density development and sustainable growth.

The London Plan should:

- explicitly refer to the MTS and accessibility for Disabled people;
- amend MBUL5 Part A(1) to: "Improves safe, inclusive and accessible, reliable and convenient access by public transport, walking, wheeling and cycling to increase London's overall housing, economic potential, and reach the Mayor's Transport Strategy aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041";
- incorporate the recommendations from the Mayor's Vision Zero Action Plan 2 on reducing exposure to traffic danger, expanding the strategic cycle network across London with protected cycle lanes, and making accessible, pleasant and inviting, walking and wheeling routes with safety designed in;
- ensure that the accessibility and inclusion objectives are carried consistently through the mechanisms by which sustainable transport infrastructure is planned and delivered;
- amend MBUL5 Part B(2) to: "be informed by proportionate evidence of transport challenges and requirements, including accessibility barriers experienced by Disabled people with different impairments and opportunities to remove those barriers and improve accessibility, with reference to TfL strategic transport modelling supplemented with local evidence as needed. Local evidence of accessibility barriers and opportunities to improve accessibility should be informed by meaningful engagement with Disabled people with different impairments and access requirements, including local Deaf and Disabled People's Organisations and access groups";
- explicitly recognise shared mobility as part of London's sustainable transport system, as well as ensure that all connections are accessible and that the evidence base used to inform local plans should be required to identify accessibility barriers experienced by Disabled people or opportunities to improve accessibility;
- amend MBUL5 Part C(1)(i) to: "Increase use of safe and accessible walking, wheeling, cycling, public transport and shared mobility services, including car clubs and vehicle rental, to and from the development";
- amend MBUL5 Part C(1)(iii) to: "maintain safe and accessible walking, wheeling and cycling access during construction";

[13] Closure of Zipcar is growing appetite for car ownership in London. CoMoUK, Jun 2026 Document > Closure of Zipcar is growing appetite for car ownership in London

[14] TfL's Stalling Car Clubs. London Assembly Transport Committee, Apr 2025 https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-work/london-assembly-publications/tfls-stalling-car-clubs-transport-committee-report

- implement the recommendation from the London Assembly Transport Committee's letter from 2025: "recognise the important part that car clubs can and should play in London's transport mix. This should include support for car clubs by recognising them as an option that enables people to reduce their car use or give up their private car";
- implement the recommendations of the Transport Committee's response to the draft Plan, in particular:
  1. recognise car clubs as shared mobility within its definition of sustainable transport,
  2. TfL must co-design updates to the Sustainable Access Measure (SAM) with Disabled People's organisations, and
  3. SAM measures must include accessibility metrics and cycling.[15]

MBUL6 High quality design for a growing, changing city & MBUL8 Inclusive design

MBUL6 does not make explicit reference to inclusive design. Inclusive design should also be embedded in 'high quality' design, regardless of the separate policy governing inclusive design in more detail. High quality design should be inclusive by nature, enabling people with a range of access requirements to use spaces safely and independently.

MBUL8 is also weak on co-production with communities and specialists, and requiring input at the earliest stages of design. Rationale paragraph 2.114 does note the need for considering 'the creation of an inclusive built environment at the earliest possible stage', but does not translate this into concrete policy. Not only will this risk developments being less inclusive and accessible, it will increase costs if inclusive design is considered belatedly.

Following engagement with Deaf and Disabled People's Organisations, I am also concerned that MBUL8 over-relies on evacuation lifts as a means of providing safe and dignified evacuation routes. Rationale paragraph 2.112 rightly notes that manual approaches should not relied on, but the policy does not properly consider contingency arrangements in case of mechanical failure or people with needs unrelated to level access.

The London Plan should:

- amend MBUL6 A(1) to say: "[Plan-making authorities should] promote good, inclusive and accessible design that reflects growth and change needs…";
- amend MBUL6 D to say: "Inclusive design review should be required, along with other specialist design review and advice where needed";
- amend MBUL8 (1) to say: "designed from the start and through the lifecycle of the development with relevant communities to respond to and accommodate the requirements of London's diverse population and be flexible to accommodate future requirements, based on the principles that everyone can use London's built environment safely, independently and with dignity..";
- amend MBUL8 C(4) to include reference to contingency plans required in the case of evacuation lifts not being functional.

[15] Transport Committee | London City Hall

MBUL7 London's heritage

While most of this policy is focused on sites of significant archaeological and architectural interest, I am pleased to see this London Plan adopt a broader definition of 'heritage'. Expanding the definition of heritage away from sites of architectural or archaeological interest is long overdue. This is something one of my predecessors Siân Berry has long been arguing for alongside community groups, with reference to the phrase 'emerging heritage'.[16]

However, paragraph 2.98 on implementation does not explicitly refer to the fact that heritage concerns activities and practices, as well as places. More often than not these aspects of heritage are intertwined, but both should be worthy of consideration and protection. Some examples of important heritage that should be considered are missing from this indicative list. Street markets and other long-standing, high social value retail spaces are not considered, despite the London Assembly Planning Committee calling on the London Plan to explicitly recognise in its heritage policy.[17] Tangible examples from the US show the impact these designations can have on individual businesses and the communities they support.[18]

While mentioning the need to engage communities in identifying sites, this policy does not specifically mention sites, places or practices of specific importance to underrepresented groups in the public realm, or otherwise marginalised groups. To create an inclusive public realm, it is vital that the Plan mandates engagement and co-production with communities less represented in the public realm and by 'designated' heritage sites.

Part B only 'encourages' Local Planning Authorities (LPAs) to develop these heritage strategies and does not provide protections for them, let alone protections comparable with other forms of heritage. Relying on LPAs to both develop these strategies and then afford locally significant heritage appropriate protections risks London continuing to use these cultural significant sites. Given this more expansive definition of heritage will not necessarily be shared across LPAs, the London Plan has an opportunity to introduce protections for locally significant cultural heritage sites that are more instructive and can be called upon directly by communities.

The London Plan should:

- update part B to read: "LPAs should conserve, protect and enhance heritage assets, including those self-defined by local stakeholders and communities. LPAs should develop local heritage strategies which capture and harness the benefits of local heritage and its contribution to a diverse cultural offer. Their production should be informed by evidence and involve collaboration between Boroughs, stakeholders and communities, in particular groups underrepresented by conventional heritage sites";

[16] Towards a New London Plan. Siân Berry, London Assembly, December 2016 https://www.london.gov.uk/sites/default/files/final_dec_2016_towards_a_new_london_plan_Siân_berry.pdf.
[17] Social value in planning and regeneration: Knowing the price of everything and the value of nothing. Planning and Regeneration Committee, London Assembly, April 2025, https://www.london.gov.uk/sites/default/files/2025-04/Social%20value%20in%20planning%20and%20regeneration%20report%20April%202025.pdf.
[18] Protect our Places (POP) evidence in response to Towards a New London Plan: Consultation on the next London Plan. Latin Elephant, Protect our Places Coalition, June 2025, pp.22-3, https://latinelephant.org/wp-content/uploads/2025/07/London-Plan-Consultation-.pdf.

- Update implementation section 3.12 to include reference to “street and covered markets”.

MBUL9 Healthy streets and public realm

Disabled people’s organisations have raised concerns that accessibility and inclusion are not sufficiently recognised within the policy framework. They say that while this policy contains important requirements to improve the accessibility of street space, it does not establish accessible and inclusive public realm as an overarching operative requirement.

I note that, while public toilets are mentioned, the specific toilets policy from the 2021 London Plan (S6 Public Toilets) has been lost.

The London Assembly Health Committee found, in its 2021 report The Toilet Paper, that 91.3 per cent of Londoners did not feel toilet provision is adequate to meet their needs, and 94 per cent said they found it quite difficult or very difficult trying to find a public toilet in London in an area they are not familiar with.[19]

This is a huge issue; it is unacceptable that when Londoners leave their homes for leisure, education or work they are unable to find a toilet. Public toilets are integral to making London healthy, accessible, inclusive and economically viable, and therefore should be part of the London Plan.

The London Loo Alliance, a coalition formed to demand more and better public toilets in London, is also: “calling on the Mayor of London to develop a GLA public toilets plan to coordinate action on improving public toilet provision in areas where the Mayor of London has a role including, TfL, Night Time Strategy Guidance for boroughs, London Plan policy and funding from programmes such as the Good Growth Fund.”[20]

The previous policy, Policy S6 Public toilets, said: “Large-scale developments that are open to the public, and large areas of public realm, should provide and secure the future management of: 1) free publicly-accessible toilets suitable for a range of users including disabled people, families with young children and people of all gender identities; and 2) free ‘Changing Places’ toilets designed in accordance with the guidance in British Standard BS8300-2:2018. These should be available during opening hours, or 24 hours a day where accessed from areas of public realm.”[21]

The new Draft London Plan 2026 in MBUL9 part C (4) simply asks that new developments: “ensure free and well-maintained toilets and drinking water fountains for public use are available within the vicinity or are co-located with other facilities in the public realm.” They are no longer obliged to ‘provide’ toilets, as paragraph 2.118 goes on to state: “Developments that provide significant new public realm are not expected to provide public toilets and drinking water fountains so long as there are agreements in place, visibly displayed, for free use of toilets

[19] The Toilet Paper, London Assembly Health Committee, November 2021, https://www.london.gov.uk/assembly-publications/toilet-paper-improving-londons-loos
[20] Founding Statement. London Loo Alliance London Loo Alliance
[21] The London Plan 2021. Mayor of London, 2021 the_london_plan_2021.pdf

and water fountains within walking distance."

This is a huge downgrade of requirements, losing the 24-hour access requirement of the 2021 Plan, along with the specific calls for gender-neutral toilets and new facilities suitable for the widest range of people to use, including Changing Places loos.

Replacing the existing requirement of free, fully accessible, inclusive 24 hour a day loos with people merely being directed to an existing loo in a shop, pub or café 'within walking distance', which is not a specific measurement, is simply not good enough and entirely insufficient. Particularly given the lack of definition for either 'walking distance' and 'visibly displayed', both of which have significant impacts on the needs of older, disabled and mobility impaired people, as well as anyone who might have a health condition impacting continence.

The London Plan should:

- amend MBUL9 Part A to: "Public realm should be welcoming, accessible and inclusive, be well-designed through a Healthy Streets Approach, be usable independently by people of all ages and abilities, and feel safe during day and night, in line with the ambitions of the Mayor's ending Violence Against Women and Girls (VAWG) Strategy";
- ensure that accessibility and inclusion are included within requirements for operations within the London Plan;
- amend MBUL9 Part B(1) to: "high-quality, accessible walking, wheeling and cycling connections, including routes that accommodate adapted and non-standard cycles, mobility aids and a diverse range of users";
- amend MBUL9 (4) to: "removing clutter on footways, including street furniture and advertisements that are poorly located, unsightly, in poor condition or without a clear function, and by creating dedicated parking bays on the road for dockless cycles and scooters";
- amend MBUL9 B(5) to: "Reducing road danger and vehicle dominance created by moving and parked vehicles, avoiding vehicle crossovers, limiting or preventing through traffic, while ensuring that proposals do not create accessibility barriers for people who rely on cars, taxis or private hire vehicles, including Disabled people. Where measures to reduce vehicle dominance or through traffic are proposed, their accessibility impacts should be assessed and adverse impacts mitigated. Safe and convenient access to buildings and public spaces should be ensured through appropriate accessible parking and pick-up and drop-off provision";
- reinstate the existing toilets policy from the current London Plan: "Large-scale developments that are open to the public, and large areas of public realm, should provide and secure the future management of: 1) free publicly-accessible toilets suitable for a range of users including disabled people, families with young children and people of all gender identities; and 2) free 'Changing Places' toilets designed in accordance with the guidance in British Standard BS8300-2:2018. These should be available during opening hours, or 24 hours a day where accessed from areas of public realm." (Note: 'Large-scale' should be taken to mean developments that fall within Category 1B, Part 1 of The Town and Country Planning (Mayor of London) Order 2008, unless a development plan provides a local definition.)";

- replace Implementation 2.118 with: "Develop a GLA public toilets plan to coordinate action and guidance on improving public toilet provision in the new London Plan".

3. Delivering the homes and neighbourhoods Londoners need

HN1 Increasing London's housing stock

We do not agree the Plan should set an overall housing target without consideration of need, affordability and tenure. Even with this viability-led target, it is very unlikely it will be met. The plan should instead be organised around the need for social housing, which should be made a genuine priority.

Table 3.1 in HN1 sets a development target without reference to tenure or size, and allocates individual targets to each borough. Regardless of the affordable housing policies that follow, this policy will enshrine a degree of ambivalence around tenure into planning. This will inevitably lead to the over delivery of market housing against social housing due to market incentives, despite the identified need in the SHMA for 313,000 low cost (social rent) homes and in this plan itself for 66 per cent of all new housing to be affordable.[22]

Tenure-blind targets fail to acknowledge that London's housing crisis is first and foremost a crisis of affordability, not a general shortage of supply. Despite the SHMA's high estimates for market housing need, the demand for new-build market homes has completely flatlined because these homes are unaffordable and undesirable for all but a very small pool of people. Meanwhile, there are almost 350,000 households on social rent waiting lists across London, a rising number of whom are living in inappropriate temporary accommodation.[23] There are many more people struggling to afford to live safely and securely in London, as private rents chew up more of people's incomes and home ownership has become out of reach of people on ordinary incomes.

A general increase in supply will not fix this fundamental issue. My predecessors on the Assembly have been making this case for several years, alongside a range of experts and other stakeholders. In a report published in April this year, independent thinktank Centre for London came to the same conclusion.[24] The Strategic Housing Land Availability Assessment (SHLAA) echoes the Office for Budget Responsibility (OBR) by acknowledging that huge increases in market housebuilding would only start improving affordability after two to three decades.[25] There is a stronger case to be made for new rental supply easing the private rented sector (PRS), but forecasts show that even if the Government met its 1.5 million homes target by 2030 the impact would be very small.[26] Above all, the next London Plan needs to prioritise improving affordability across the housing stock.

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[22] 2026 Strategic Housing Market Assessment (SHMA), Mayor of London, July 2026, p.5.
[23] London's temporary accommodation crisis – the latest data. Trust for London, June 2026, https://trustforlondon.org.uk/news/temporary-accommodation-london-data/.
[24] Delivering the Homes London Needs: What will it take? Centre for London (Rob Anderson and Daniel Reast), April 2026, https://centreforlondon.org/wp-content/uploads/2026/05/CFL-Delivering-the-Homes-London-Needs.pdf.
[25] 2026 London Strategic Housing Land Availability Assessment (SHLAA). Mayor of London, September 2026, p.74.
[26] Taking back control of rents: The impact of rent regulation on affordability, public spending and landlord profits. Beth Stratford and Joe Beswick, UCL Institute for Innovation and Public Purpose, July 2026, p.11, https://www.ucl.ac.uk/bartlett/sites/bartlett/files/2026-09/Taking%20back%20control%20of%20rents_2026.pdf.

From a planning perspective, the solution is to provide more social homes. As well as providing people homes, new social housing will have positive ripple effects around the economy and the rest of the housing market. Housing charity Shelter describes building and buying a new generation of social homes as the 'only lasting solution to the housing emergency'.[27]

Yet, HN1 does not reflect this priority. The rationale for HN1 notes: "it is recognised that London has a very high housing need of multiple types and tenures." This seems to follow the assumptions set out in the SHMA, which flattens need into a single definition. This justifies an approach laid out here that new market housing is equally as valuable as new social housing, and can serve similar purposes. The Mayor has been eager to argue that new market housing has a trickle down impact on affordability and need through the 'chains of vacancies' theory.[28] But, as well as never being well-evidenced, this idea has been theoretically discredited.[29]

While the Plan introduces affordable housing targets elsewhere, retrofitting targets onto headline delivery goals has a track record of failure. It is the same approach that has been used in the London Plan since its inception. Since 2004, successive Mayors have set a gross target for additional homes, implemented a strategic affordable housing target as a % of this total, and concentrated development around key growth areas. Tenure-blind targets combined with viability testing provide the rationale for approving schemes without them meeting affordable housing criteria. This strategic target for affordable housing has never been met, meaning market housing has *overdelivered* as a % of total delivery. Over the last two decades, the number of the homes per person in London has risen and new supply has outstripped household formation.[30] But, by every measure, the housing crisis has got much worse.

The policy as it stands tries to straddle need with development capacity and viability. It is right to consider development capacity, but the Plan should consider how best to use the existing housing stock. It should also make tenure priorities based on a detailed and robust assessment of need. Instead, we have extremely high, tenure-blind targets of 55,000 homes per year (40,000 homes higher than last year's delivery rate and around 20,000 higher than the delivery average since 2010), which the Deputy Mayor admitted needed a number of enabling factors to be possible.[31]

The Plan's strategy of intensification led by this policy may have huge costs, without effectively meeting housing need. First of all, in terms of the huge carbon emissions of construction that may not be necessary. Secondly, for intensifying areas that least need development, while other

[27] Shelter, Brick by Brick: A Plan to deliver the social homes we need.
[28] Anti-displacement planning tool (2). Zoë Garbett, London Assembly, March 2025, https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/anti-displacement-planning-tool-2.
[29] Build, baby, build (with lower rates of affordable housing in London). Peter Apps, Substack, October 2025, https://peteapps.substack.com/p/build-baby-build-with-lower-rates.
[30] A home for all within planetary boundaries: Pathways for meeting England's housing needs without transgressing national climate and biodiversity goals. Ecological Economics (Sophus O.S.E. zu Ermgassen, Michal P. Drewniok, Joseph W. Bull, Christine M. Corlet Walker, Mattia Mancini, Josh Ryan-Collins, André Cabrera Serrenho), November 2022, https://www.sciencedirect.com/science/article/pii/S0921800922002245.
[31] Transcript of Agenda Item 7 – Scrutiny of the Draft London Plan. London Assembly Planning Committee, September 2026, p.1, https://gla.moderngov.co.uk/documents/b31863/Minutes%20-%20Appendix%201%20-%20Transcript%20of%20Scrutiny%20of%20Draft%20London%20Plan%20Friday%2004-Sep-2026%2010.00%20Planni.pdf?T=9.

areas remain underdeveloped. Examples of this are estate infill (including on green spaces) or wholesale regeneration, development on precious industrial land, and building on the Green Belt – which developers may turn to first as relatively uncomplicated development projects. Finally, building the wrong homes – like building lots of market housing in places where social need is very high – comes with a huge opportunity cost by wasting of scarce land supply in local areas and intensifying displacement pressures (more on this in my response to HN3).

The London Plan should:

- replace this target with an overall target for social-rented homes across a range of housing sizes;
- re-introduce a policy on making best use of existing housing, which could be a subsection of this policy;
- introduce a genuine brownfield-first policy, ensuring greenfield sites are not unnecessarily developed.

HN2 Protecting and reshaping housing

While I welcome additional protections for social housing during estate 'regeneration' schemes, I am extremely concerned about a policy that does not prioritise refurbishment, and without proper safeguards for existing communities against the extremely well-evidenced environmental and social costs of demolition.

HN2 introduces additional protections for social housing floorspace, regardless of if residents take up the right to return. The loss of social housing and displacement of long-standing communities through estate regeneration has been extremely well documented in the last two decades.[32] As we have seen, even with the addition of the 'right to return' policy in the 2021 Plan, residents are still being pushed out and social housing is being lost – like on the Lesnes Estate in Thamesmead.[33]

However, this policy only requires the replacement of social housing *floorspace*, not habitable room, and not individual social *homes*. Floorspace is not the same as habitable room, so between the higher space standards of modern social housing and non-habitable floorspace, this could still result in a significant loss of social homes and habitable room as a result of regeneration.

Given how desperately we need social homes, reprovision of units should not be dependent on residents taking up their right to return. There are many reasons residents do not take up their right to return, although this is under-researched. Given the length of time estate regeneration schemes take to complete – if they do at all – there are any number of reasons why residents do not return to the estate.

For redevelopment schemes that have typically been incredibly disruptive and uncertain, hinging social housing reprovision on the 'right to return' creates the wrong incentives for developers. The right to return is agreed at section 106 stage, so it is not a viability concern for developers. Where residents don't take up their right to return, developers can provide that would-be social housing as private housing (as long as they have met the new minimum floorspace expectations) and will be a bonus profit for the developer. They are financially incentivised to drag schemes out and otherwise limit the likelihood of residents taking up their right to return.

The length of time residents spend in limbo during demolition projects was one of many issues raised by former Assembly Member Zoë Garbett in her report from March 2026, which has not

[32] E.g. Estate renewal in London: an assessment of regeneration-induced displacement. Phil Hubbard and Lorretta Lees, UK Collaborative Centre for Housing Evidence, 2020, https://housingevidence.ac.uk/wpcontent/uploads/2025/10/11873_CaCHE_policy_briefing_200715_final.pdf. Estate resident ballots: Are they working well? Siân Berry, London Assembly, 2022, www.london.gov.uk/sites/default/files/2022_07_12_ballot_research_Siân_berry_final_1.pdf. Big Capital: Who is London For? Anna Minton (London: Penguin, 2017). The promise of cross-subsidy: Why estate demolition cannot solve London's housing emergency? Dr Joe Penny & Public Interest Law Centre, 2024, https://cdn.prod.website-files.com/6a16f207b4af9964ae6854dd/6a26dacf9dfe1f01c1b12f93_6a26d92d9dfe1f01c1b0630a_The-promise-of-cross-subsidy_FULL-REPORT.pdf. ' Knock it Down or Do it Up? London Assembly, 2015, https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/KnockItDownOrDoItUp_0.pdf.

[33] "Left to Rot": Is Estate Regeneration still failing Londoners? Zoë Garbett, London Assembly, 2026, p.18 https://www.london.gov.uk/sites/default/files/2026-03/Zo%C3%AB%20Garbett%20Estate%20Regeneration%20Report-2026.pdf.

been properly addressed in this Plan and should be considered. [34] As described in that report and elsewhere, regeneration projects stalling can have a devastating impact on residents' wellbeing.[35] Examples all over London, from the Bacton estate in Camden to the Aylesbury in Southwark and Carpenters in Newham, show the risks of placing the future of estates and their residents at the hands of a notoriously volatile private housing market. It can also have huge knock-on impacts for councils and other families on the housing waiting list. In Southwark alone, more than 1000 council-owned homes are currently empty due to stalled regeneration schemes.

Under this London Plan policy, estate regeneration will still create a huge amount of uncertainty for residents and continue to risk displacement and community destruction. There are no genuine safeguards against resident displacement (even with the 'right to return', as it may never materialise). Expectations for resident involvement and consideration of alternatives are still not robust. The future of London's estates may still be gambled on the basis of private cross-subsidy and a market-led vision of what estates should be, rather than a resident-led one. Meanwhile, community-led plans are already helping devise futures for estates that minimise demolition, disruption and environmental damage, while being viable and far better meeting the housing needs of Londoners.[36]

The draft Plan, with its huge market housing targets and push to rapidly densify, will incentivise the demolition and replacement of low-rent housing with denser, market-led regeneration schemes. But the protections for communities and housing providers against the risks of a broken cross-subsidy model remain incredibly weak. There are very few safeguards for resident involvement or the genuine consideration of community-led alternatives. This risks estate regeneration continuing to be actively detrimental to meeting London's housing need, and the huge social and environmental costs that come with it, disproportionately felt by poorer and marginalised Londoners.

The London Plan should:

- introduce a presumption against demolition, at a minimum when existing residents cannot be guaranteed a single move into a new home on the estate;
- guarantee the re-provision of social housing habitable floorspace and units, size mix and accessible homes;
- amend C(2) to say: "demonstrate that reasonable refurbishment and retrofit options have been considered for every building on the estate and weigh the potential benefits";
- provide clarification on what 'thorough assessment' of alternatives looks like in the implementation section, making specific reference to community-led plans.

[34] "Left to Rot": Is Estate Regeneration still failing Londoners? Zoë Garbett, London Assembly, 2026, p.18 https://www.london.gov.uk/sites/default/files/2026-03/Zo%C3%AB%20Garbett%20Estate%20Regeneration%20Report-2026.pdf.

[35] Estate Regeneration and Its Discontents: Public Housing, Place and Inequality in London. Paul Watt (Bristol: Bristol University Press, 2021). "So, Don't You Want Us Here No More?" Slow Violence, Frustrated Hope, and Racialized Struggle on London's Council Estates. Loretta Less and Phil Hubbard, (Housing, Theory and Society, 39, 341–358), 2022.

[36] E.g. Alton Estate People's Plan. Pablo Sendra. https://pablosendra.com/ucl/alton-estate-peoples-plan/

HN3 Delivering affordable housing

We do not support the reduction in affordable housing thresholds, nor an approach to delivering affordable housing that is based on commercial viability rather than need.

HN3 proposes replacing the existing London-wide 35 percent affordable housing threshold for all new developments with a tiered approach, where boroughs are assigned a threshold of 35 per cent, 25 per cent or 20 per cent. The targets for public land have also reduced correspondingly and exemptions are applied for certain kinds of development. This policy also reaffirms a strategic 50 per cent target for affordable housing and sets out need for low-cost and other affordable rent homes (which our response to HN1 argues should have a far more privileged position in this Plan).

Paragraph 3.58 explains these changes are based on an assessment of viability, not need (the draft Plan identifies that 66 per cent of total housing planned for should be at affordable levels). The rationale for the reduction in the thresholds is that it will deliver more affordable housing by incentivising developers to stretch a little extra to hit the affordable housing target rather than go through a lengthy viability testing process.

This, however, bears little resemblance to viability – where the chief pressures are external to the planning system rather than internal. As my colleagues demonstrated in response to the Emergency Housebuilding Measures consultation in January 2026, cutting affordable housing thresholds will not alone tip schemes over into becoming commercially viable across London.[37] The evidence presented via the viability study is not a convincing counter-argument.

This policy also does not consider the impact of this threshold cut in outer boroughs on land prices, and the knock-on impacts this will have on overall affordable housing delivery. As affordable housing requirements go down, land prices go up. The 2021 London Plan, justifying the hard-won 35 per cent thresholds, acknowledged the negligible impacts of loosening affordable housing requirements on housing delivery, stating: "In previous years where there has been a relaxation in affordable housing and other planning requirements this has typically led to higher land values, rather than an increase in housing delivery."[38] The rationale for HN3 does not explain why the Mayor has disowned this analysis or why he no longer views his policies as market-shaping. Instead, easing requirements risks indulging a race to the bottom on the basis of commercial viability, just when affordable housing need is at its highest.

As well as restricting affordable housing delivery via market mechanisms, higher land prices risk undermining direct delivery of affordable housing by councils and other registered providers of social housing (RPs). The London Assembly Housing Committee's meeting in January 2026 collated evidence from a number of London councils and the G15 group of housing associations who noted that the cost of land is prohibitive to building new affordable homes, often bought over many years when prices were their highest.[39] This policy risks making it harder for RPs to compete in the land market and directly build more of the schemes at 50, 60, 70 per

[37] Bailing out a broken system: Zoë Garbett AM response to 'Support for housebuilding' draft London Plan Guidance (LPG) consultation. London Assembly, January 2026, https://www.london.gov.uk/bailing-out-broken-system-zoe-garbett-am-response-support-housebuilding-draft-london-plan-guidance

[38] 2021 London Plan, Mayor of London, p.174.

[39] London Assembly Housing Committee, 'Assessing delivery, challenges and opportunities of the Mayor's Affordable Homes Programme', (London Assembly, January 2026), https://www.london.gov.uk/about-us/londonassembly/meetings/documents/s120293/05%20Appendix%201%20Housing%20Committee%20-%20Affordable%20Housing%20report.pdf.

cent affordable housing that will start making a dent in housing need. It is a remarkable concession to housebuilders at the same time that the Mayor has said cross-subsidy 'is clearly broken' as a model for delivering the affordable housing we desperately need,[40] a view echoed across the sector.[41]

The impacts of this will be felt geographically. Having different thresholds for different boroughs will reinforce spatial divisions between inner and outer London in terms of social housing stock, with inner London already having a much larger social housing stock proportionally compared to suburban London. This also risks missing an opportunity to deliver affordable housing in lower density, suburban, mid-rise typologies (the problems of the alternative are noted in MBUL2).

This policy also does not take issue with the outsized influence of viability testing, which continues to inflate land values and come at a cost to affordable housing. Private developers have become increasingly adept at using viability testing mechanisms to erode affordable housing requirements and local authorities have little resources or power to resist this process.

In their critique of the Mayor's Emergency Housebuilding Measures launched earlier this year, housing charity Shelter showed how developers routinely overpay for land and make these costs back by negotiating away affordable housing commitments at the viability testing stage.[42] This is a structural failure of the land market permitted through planning policy, meaning Londoners lose out on precious affordable housing while the land held by developers gain value.

Rationale paragraph 3.55 of HN3 notes the opportunity cost of building the wrong homes where need is high, without translating this into policy. Toughening the London Plan to restrict this opportunity cost is something we have made the case for repeatedly, including in my predecessor Zoë Garbett AM's response to the Emergency Housebuilding Measures from January 2026.[43] We are already in a situation where RP schemes are being approved at 100 per cent affordable,[44] while private developments are chewing up big swathes of developable land for schemes as low as six or seven per cent affordable through viability testing.[45] In part, this is

[40] Reversing the emergency housebuilding measures, London Assembly, July 2026, https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/reversing-emergency-housebuilding-measures

[41] Major housing associations raise concerns about grant rates and warn cross-subsidy model faces 'real challenges' in London. Lara Bowman, September 2026, https://www.insidehousing.co.uk/news/major-housing-associations-raise-concerns-about-grant-rates-and-warn-cross-subsidy-model-faces-real-challenges-in-london-98836

[42] Build up not trickle down: The case for need-led housing policy. Shelter (Sam Bloomer, Dr Charlie Berry, Charlie Trew), February 2026, https://assets.ctfassets.net/6sxvmndnpn0s/4q9RRsKTaXtRTN3FADtIzR/0fba0d15f051f030f27231359bd5d387/Build_Up_Not_Trickle_Down_-_The_Case_for_Need-Led_Housing_Policy.pdf

[43] Bailing out a broken system: Zoë Garbett AM response to 'Support for housebuilding' draft London Plan Guidance (LPG) consultation. Zoë Garbett, London Assembly, 2026 https://www.london.gov.uk/sites/default/files/2026-07/2026_01_22%20Zo%C3%AB%20Garbett%20response%20to%20draft%20LPG_3.pdf.

[44] Clarion's plans for 100% social rent homes at Penge's Blenheim Centre given green light. Clarion Housing Group, May 2026 https://www.clarionhg.com/news-and-media/2026/05/19/plans-for-100-social-rent-homes-at-penges-blenheim-centre-given-green-light.

[45] Deputy Mayor Approves Section 73 Application. Canada Water, March 2026, https://canadawater.co.uk/latest/news/deputy-mayor-approves-s73-revisions-to-canada-water-masterplan/.

because of the tenure-blind targets laid out in HN1 that assume all housing delivery is worthwhile. Londoners cannot afford to get so little back from our land supply, especially in inner London where affordable housing need is very high and developable land is so scarce. If cross-subsidy is dead, the London Plan should bury it.

The London Plan should:

- reinstate the 35 per cent cross-London threshold and the 50 per cent public land threshold across sites of all size;
- (as in our response to HN1) introduce city and borough-wide targets for social housing delivery so site allocation and development approval is informed by need in the context of land scarcity, and viability testing is devalued.

HN4 Gypsy and Traveller accommodation

Despite the GTANA underestimating the need across London for Gypsy and Traveller sites,[46] it is good to see the London Plan create *minimum* targets for new pitches for each borough and the mainstreaming of sites as part of large-scale developments.

However, as I have laid out in response to MBUL1 and HN1, the draft Plan's blueprint for land intensification across London jeopardises existing Gypsy and Traveller sites in well-located, sustainable places. It does so without a convincing approach to prioritising land or need, meaning the displacement of Gypsies and Travellers may not even result in meeting a more urgent housing need. All but one of the 45 Gypsy and Traveller sites across London are within one mile of train station, making their sites prime for redevelopment.

The impacts of displacement will be magnified as the draft Plan has ditched the requirement included in the 2021 Plan to provide new pitches before displacement. This is a very real risk for London's Gypsy and Traveller communities, for whom a new site has not been built in 30 years. For instance, Lewisham residents displaced from a site in 2009 had to wait 17 years, until this summer, for a replacement site in the borough.[47]

Part A(4) proposes expanding existing sites to meet some of this need. This sounds sensible, but there is significant concern across London is the poor state of sites, particularly in terms of their upkeep and environmental health. Academics have termed this 'environmental racism', identifying that most sites are within 100 metres of major sources of pollution.[48] The Plan should provide guidance on adding capacity to existing sites affected by these hazards.

The London Plan should:

- reinstate the requirement for replacement sites to be provided before redevelopment of Gypsy and Traveller sites begins;
- amend A(4) to include reference to the need for remediation on some sites, consistent with policies GHR10 and GHR5. Policy GHR10 should directly make reference to the need for environmental mitigations on all affected sites required to make sites safe and habitable;
- add further implementation guidance on definitions of 'culturally suitable accommodation' (A(2)), around how new sites should be incorporated into larger scale developments in (A(5)), made in collaboration with London's Gypsy and Traveller communities.

[46] Signs of Improvement in the Draft London Plan? London Gypsies and Travellers, July 2026, https://www.londongypsiesandtravellers.org.uk/news/2026/07/17/signs-of-improvement-in-the-draft-london-plan/.
[47] At last a new London site. London Gypsies and Travellers, June 2026, https://www.londongypsiesandtravellers.org.uk/news/2026/06/30/at-last-a-new-london-site/.
[48] Environmental racism, segregation and discrimination: Gypsy and Traveller sites in Great *Britain*. A. Bloch & K. Quarmby, 2025, Critical Social Policy (45(1), 94-114)

HN6 Build to Rent

We do not support the concessions and incentives for private Build to Rent (BtR) developments. Social housing is too desperately needed, and the purported benefits of BtR do not stack up.

HN6 encourages BtR development and incentivises its development by permitting affordable housing to be supplied only at discounted market rent levels, with none at social rent levels. This concession on social housing is justified on the basis that Build to Rent will bring other benefits to the housing market. Rationale paragraph 3.91 says BtR 'addresses identified housing needs, providing greater choice for Londoners' and 'works to diversify sites and in turn speeds up their build out – helping deliver against identified housing targets'.

However, there is little evidence for the unique benefits of BtR. For a start, there is limited demand for expensive Build to Rent flats. BtR developments are high-end accommodation with average rents higher than the rest of the private rented sector (PRS) across all sizes of home (and median rents likely to be *a lot* higher).[49] There is a shallow pool of potential demand for these homes, given the limited number of renters on high enough incomes. Letting figures across London are hard to gauge, but journalists are reporting on empty Build to Rent developments and slow letting rates across London.[50]

According to analysis by Business LDN, the BtR sector is largely sustained on demand from international students. One-third of residents living in BtR are students, most of whom are international students.[51] But the numbers of international students are in steady decline. And there is no consideration of how this policy sits alongside Policy HN5 covering purpose-built student accommodation, which is also dependent on demand from wealthier, typically international students.

BtR investors are not interested in flooding the market with new supply to make their housing more affordable. Typically owned entirely by a single institutional investor who are happy sitting on longer-term investments, these blocks will often be the largest source of new housing supply in a given rental area. They are unlikely to be undercut and can choose how quickly to let their flats to sustain desired rents.

The Mayor is often quick to say that the benefits of Build to Rent will trickle down the rest of the private rented sector. Given the many distortions of the housing market, which doesn't work like other commodity markets, the relationship between supply and demand is imperfect. It may still have some impact on the overcooked PRS. But this trickle-down impact is still limited by people vacating existing private rented stock and moving into new Build to Rent homes. The slow lettings rates of Build to Rent homes across London show the number of people capable and willing to do this is small, and may reach a point of saturation.

Backing Build to Rent can also have a series of unintended consequences. For all the talk of 'diversifying' the housing market, Build to Rent has dramatically increased its market share

[49] Who Lives in Build to Rent? Business LDN, June 2026 www.businessldn.co.uk/sites/default/files/documents/2026-06/Who%20Lives%20in%20Build%20to%20Rent%20June%202026_0.pdf.
[50] Are slower letting rates changing the Build to Rent market? Inside Housing Living, January 2026 https://living.insidehousing.co.uk/analysis/are-slower-letting-rates-changing-the-build-to-rent-market-in-london-95354.
[51] Ibid.

since 2018, nearing 5 per cent of the total private rented housing stock in London.[52] This market share is even more concentrated in some areas, like Elephant and Castle, Stratford and Wembley. Enabling big corporate landlords to have significant market control over town centres has already started having an impact, through high rents and evidence these rent rises are having a ripple effect on the wider community, now becoming more 'desirable' and served by higher end amenities. Brent, Ealing and Newham, the boroughs with the highest numbers of Build to Rent developments, saw around 50 per cent rental price rises in the past 10 years.[53]

In Copenhagen, the city council is having to fight its way out of a crisis caused by too much institutional investment into its housing stock and the monopoly dynamics this creates, a process we are seeing the beginnings of here.

This is not to say Build to Rent has no place in the housing market. Municipal Build to Rent, like that proposed by Centre for London, could provide better value rental accommodation than the private sector is providing while recycling rents back into the housing system for public benefit. But the private model pursued here provides a significant concession to developers on desperately needed social housing, while the lack of democratic control of this kind of institutional investment in housing risks deepening parts of our housing crisis.

The London Plan should:

- insist Build to Rent provides social housing as part of its affordable housing mix in perpetuity;
- restrict the density of Build to Rent developments in a given housing market (like a town centre), up to 5 per cent of market share;
- define a separate policy for Municipal Build to Rent.

[52] Build to Rent reaches highest PRS market share. Mortgage Solutions, February 2024, https://www.mortgagesolutions.co.uk/mortgage-news/2024/02/26/build-to-rent-reaches-highest-prs-market-share/.
[53] Build to Let Down. Adam Almeida, Financial Times, August 2025 https://www.ft.com/content/936fc009-ad67-4bcd-b2e2-67448019854c.

HN7 Housing size mix

The aim of this policy is to "ensure that new development provides a range of housing sizes… without undermining viability and the ability to achieve higher housing targets." This is an extension of the target-driven approach set out in MBUL1 and HN1, which is market led, assumes all homes built are of equal value and pays little attention to need. Within the parameters set out in HN7, developers will inevitably deliver more profitable smaller units instead of providing a genuine housing mix the policy purports to want.

We are already seeing this approach inform the funding programme organised through the Social and Affordable Homes Programme, which does not award extra grant funding for bigger homes, despite three and four bedroom social homes being most in need. The pursuit of targets disconnected from housing need creates the wrong incentives and produces poor outcomes for Londoners.

Part C of HN7 says that development proposals should refer to findings in the SHMA to inform their mix of unit sizes. Like its previous iterations, the SHMA has estimated a very high need for private market housing at one and two bedrooms – this time at 88 per cent of market need. According to evidence the London Assembly Housing Committee heard at the start of September 2026, this level of need for smaller homes (of all tenures) is not recognised by local authorities. This may be because the SHMA seems to make a number of assumptions about the housing market – that it is London-wide and not subject to area-specific demand and cost pressures, that new market-rate housing is more affordable and desirable than it is, and particularly that there is a fluidity across the London housing market that new market homes will unlock, imbuing a 'chain of vacancies' effect across the market – that distort the assessment produced in the SHMA.

The London Plan should:

- introduce London-wide targets for size mix by tenure based on a re-evaluation of housing need, which boroughs can adjust accordingly.

HN9 Accessible housing

While we welcome the strengthening of this policy, HN9 is currently insufficient to address the range and extent of unmet housing need among Deaf and Disabled Londoners.

While HN9 mandates a proportion of affordable homes to be wheelchair accessible, it stops short of specifying tenures. The rationale for not introducing a specific social rent target is to 'provide flexibility to suit different contexts and sites' and give Local Authorities freedom to "determine how they will apportion the 10% requirement across different affordable housing tenures."[54] But we know that data collection at a borough level is still incredibly poor, with local authorities who gave evidence to the London Assembly Housing Committee being unable to provide accessibility information for people on their housing waiting lists.

Despite this lack of borough data, the Mayor stopped short of commissioning a London-wide Disabled people's needs assessment. Available evidence points to a chronic shortage of social rented accessible housing across London.[55] Disabled Londoners are also more likely to live in poverty. Not mandating social rent risks concentrating affordable, accessible housing delivery in intermediate tenures, which will creating gaps in meeting housing need. Flexibility for boroughs is not good enough, when the lack of social accessible homes is a London-wide crisis from years of under-delivery, so it demands more London-wide intervention.

In terms of market homes, HN9 does not mandate that any market homes should be wheelchair accessible, only wheelchair adaptable. This may leave wheelchair users living in unsuitable homes, while waiting for the necessary adaptations to be subsequently fitted. The costs of adaptation land on already strained local authority budgets via Disabled Facilities Grant (DFG), rather than being provided up front by developers.

HN9 part G. proposes wheelchair accessible homes should be delivered on the ground floor. While I understand the rationale, this risks closing off options of where wheelchair users can live and segregating residents in buildings.

The London Plan should:

- make M4(3) market homes fully accessible to start with, rather than adaptable;
- ensure the 10 per cent of affordable M4(3) housing reflects affordable housing split elsewhere in the plan (i.e. 60-40 per cent split, low-cost vs other affordable tenures), with flexibility for LPAs to demand higher proportions of social rent;
- consult with DDPOs to introduce additional guidance into the implementation section covering making homes accessible for people with different impairments;
- amend G. to encourage developers to provide accessible homes on a range of floors, providing guidance in the implementation section around the maintenance and contingency requirements needed to make this reliable and safe.

[54] Draft London Plan wheelchair accessible homes (2). Benali Hamdache, London Assembly, https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/draft-london-plan-wheelchair-accessible-homes-2.
[55] Barriers at Home. Inclusion London, February 2025, p.6 https://www.inclusionlondon.org.uk/wp-content/uploads/2025/02/Barriers-at-Home-report.pdf.

4. Growing London's economy in a way that benefits all

GLE1 Sufficient and appropriate employment space (and GLE5, GLE7)

In its all-out pursuit of economic growth, this Plan risks chewing up incredibly socially valuable, lower-cost businesses that are integral to sustaining a diverse, real economy and creating an inclusive city (this is expanded on further in our response to PV3, although the major, unresolved tensions this Plan creates are considered in HN1 and MBUL1).

In this context, the policies aimed at preventing displacement, GLE1 F and GLE5 B(2), are necessary. But they must be cognisant of the distinct value of individual businesses (rather than considering them solely in terms of floorspace), make clear the range of businesses that should consider themselves protected under these policies, and consider mitigations for temporary displacement and relocation.

Part of this need for low-cost spaces to run businesses and create employment could also be met through a re-thinking of 'affordable workspace'. BusinessLDN has identified how it is being used for low-cost office space and often lying empty.[56] Given the need to diversify our economy and sustain low-cost, existing businesses, the Plan should re-focus affordable workspace around restricting displacement pressures on long-standing small businesses.

The London Plan should:

- make GLE1 and GLE5 require the reprovision of low-cost workspace, not simply provide a consideration. This should be occupied by the existing businesses, or others that meet local need for existing residents if those existing businesses do not want to return. The costs of re-provision should be covered by the developer;
- make GLE1 and GLE5 require LPAs to make provision for the temporary relocation of businesses prior to displacement while redevelopment is underway, in suitable premises and on an agreement the developer and LPA will support business viability on a new location (considering factors like loss of footfall and costs of relocation).

GLE3 Data centres, GLE11, GHR1, GHR2

The addition of a data centre policy, GLE3 is welcome, though the impacts of data centres that are already being highlighted are often impacts of concern for other developments. Given that policies GHR1 (Energy-efficiency) and GHR2 (Low-cost low-carbon heat) are also of note for any development that uses a lot of energy I will also respond to them here along with a small point on GLE11 (Circular economy).

There is a real problem of equity at a time when housing is constrained and Londoners are asked to reduce their usage of resources like water, and have affordability concerns on energy and water, whilst simultaneously there is a lack of transparency and accountability on energy and water use by major sites. Additionally the concerns about temporary power supplies, water pollution, use of forever chemicals, wasted heat warming surrounding areas, and waste that can arise from data centre operations can also apply to other sites. The danger is that a focus on

[56] Affordable Workspace: Time for a rethink. BusinessLDN, April 2026, https://www.businessldn.co.uk/news-publications/blog/affordable-workspace-time-for-a-rethink

investment in data centres will push further away from targets the Mayor is supposed to championing, including bringing London's climate emissions to net-zero.[57] [58]

Therefore there is a case for further requirements on data centres to be considered on other larger scale commercial developments that cross a certain threshold for energy and water use. All such developments, including data centres, should have a target for their energy and water use set out clearly, open monitoring of their use, along with use of temporary water and energy sources, and be challenged on the sources of their water and power to make them as sustainable as possible, including by increasing the efficiency of their use. [59]

Data centres may have valuable waste heat, but may also present a heating challenge to their surrounding environment. Waste heat should either be minimised, or used as a source for heat networks, and local power or hot water uses. In a warming city there should be an assessment made of the impact on the local area for the warming effect of any planned development at °C above preindustrial levels by 2050, and at the high end of possibilities, reaching 4°C above preindustrial levels. The Climate Change Committee has also explicitly said that: "Water intensive infrastructure, such as data centres, should be sited and constructed without adding to regional drought risk, and with minimum standards to avoid the lock-in of less efficient technologies."[60]

The hardware within data centres, the computer processing or storage they house, presents its own challenges. There are issues both with the unpredictability of future demands of hardware, which make the prediction of energy usage and cooling needs difficult, but also of the waste caused by early replacement of technology. The Basel Action Network has started issuing a series of white papers on the potential impacts of artificial intelligence on waste. Its first paper notes that artificial intelligence 'represents a paradigm shift in computing's material footprint' and that e-waste impacts of the rapid investment in data centres imply a future replacement cycle of technology resulting in the need for disposal of an unprecedented level of electronic waste. There should be a clear plan to move to a more sustainable, circular approach to hardware within data centres, supported by the London plan and wider waste policy in London.[61]

The next London plan should:

- require robust estimates of data centres use of energy, water and other resources, with ranges attached to estimates and full, transport post-occupation monitoring;
- minimise any waste heat from data centres, and ensure any usable heat is captured and used to displace the use of energy for heating;

[57] New Report: Big Tech Data Centres: a Threat to UK Decarbonisation, Global Action Plan, 1 October 2025, https://www.globalactionplan.org.uk/latest/news/new-reportbig-tech-data-centresa-threat-to-uk-decarbonisation

[58] Just two new data centres will pump out more planet-heating carbon emissions than ExxonMobil, Foxglove, 26 August 2026, https://www.foxglove.org.uk/2026/08/26/just-two-new-data-centres-will-pump-out-more-planet-heating-carbon-emissions-than-exxonmobil-foxglove-analysis/

[59] Data Centres' Water Use - Water UK's response to the Environmental Audit Committee call for evidence, Water UK, 2 April 2026, https://committees.parliament.uk/writtenevidence/164766/html/

[60] A Well-Adapted UK, Climate Change Committee, 20 May 2026, https://www.theccc.org.uk/publication/a-well-adapted-uk/

[61] AI E-Waste May be 40 to 60 Times What Has Been Estimated, New Analysis Finds — Basel Action Network, Basel Action Network, 15 September 2026, https://www.ban.org/news/2026/9/15/ai-e-waste-may-be-40-to-60-times-what-has-been-estimated-new-analysis-finds

- stop data centres being built where they would remove the supply of water or energy, or other resources from supplies needed for anyone in the region
- ensure waste policy is updated in light of the growth of e-waste, to ensure that valuable resources such as copper are not wasted.

GLE9 Aviation

The Government has now said of Heathrow expansion that 'principally, it's a matter for London and Londoners'.[62] The draft aviation policy, by making clear that London's six main airports function together as a single system, highlights correctly that there is space within existing capacity. At present we have expansion underway to provide new capacity for passengers per annum in different stages at Gatwick (29m), City Airport (2.5m), Luton (14m), and Stansted (7.5m in 2021 and 8m in 2025). The requirements on proposals for expansion at Heathrow are right to be identified in this plan, but the shorter policy does remove the ability of this policy to spell out all of the negative health and environmental impacts that aviation expansion causes. The Government, if it intervenes in any decision on Heathrow, or other large infrastructure proposals in London, should make clear its response to the issues that are raised by London's representatives, and its response to adopted policy in London, including the London Plan.

Any expansion of aviation will lead to intense pressure on future carbon budgets, further emissions that cause climate change, and risks expanding London's economy in an unsustainable way. The investment that goes into Heathrow, even if partly from private resources, will be an investment away from other priorities – particularly tackling the causes and effects of the climate crisis, that should be London's focus.[63]

The London Plan should:

- encompass all of the negative impacts airport expansion poses to Londoners, including health and environmental impacts;
- summarise the Mayor's argument against airport expansion;
- set clear tests for the Government or any other body to answer if they override the policies in the London plan on aviation.

[62] Andy Burnham refuses to back third runway at Heathrow, BBC News, 27 September 2026, https://www.bbc.co.uk/news/articles/cvrl6y8rx08wo

[63] Response to Heathrow Expansion National Policy Statement consultation, Zack Polanski, September 2029, https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-members/publications-zack-polanski/zack-polanski-am-route-cutting-carbon/zack-polanski-response-heathrow-expansion-national-policy-statement-consultation

5. Creating a greener, healthier, and resilient city

GHR1 Energy-efficiency

There is an opportunity to better future-proof new homes, especially flats in London to have support for new opportunities such as plug-in solar.[64] It is clear from early guidance on plug-in solar that one of the features that makes it easiest to install is an outdoor plug-socket, as panels need to be plugged directly into a socket.[65] In warmer countries where it has been expected to install an air conditioning unit or other appliance on a balcony for a flat has been standard, but it is not standard in the UK.

Consideration should be given to how features such as outdoor plug sockets can become normal for flats, along with wider supportive policy for plug-in solar in all policies relevant to Londoners, and small businesses so that they can take full advantage of plug-in renewables and energy storage as they are available to reduce their bills. This should include consideration of any safety risks from batteries so that they are reduced, and the use of battery storage on communal area energy supplies. There should also be support with a clear standard that can be used in retrofit as well as new buildings, so that support can be enabled in the widest range of London buildings, including when large buildings are refurbished.

The London Plan should:

- update policy GHR1 to have specific support for plug-in energy generation and storage, including appropriate places to plug in such technologies;
- include full assessment of any plug-in energy generation and storage, such as plug-in solar in the post-occupation energy monitoring.

GHR3 Whole life-cycle carbon

The updated policy on whole life-cycle carbon as a stand alone policy is welcome, but could learn more from the London Assembly report on Retrofit vs Rebuild – reducing the impact of London's built environment. [66]

The committee drew valuable lessons from the application of carbon assessment in practice, including the need for independent audit, and the benefit of optioneering for possible options for existing buildings, as the City of London have implemented.

As with all assessments, the outcome of building design, particularly on those matters that risk human health such as overheating – should be considered in review, this is not current included in the GLA Energy Monitoring Reports.[67]

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[64] Households can save as plug-in solar panels come to market, Department for Energy Security and Net Zero, 26 August 2026, https://www.gov.uk/government/news/households-can-save-as-plug-in-solar-panels-come-to-market

[65] Plug-in solar panels: Checks to make before you buy, Energy Saving Trust, accessed September 2026, https://energysavingtrust.org.uk/plug-in-solar-panel-checklist

[66] Retrofit vs Rebuild – reducing the impact of London's built environment, London Assembly, 7 February 2024, https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-press-releases/retrofit-vs-rebuild-reducing-impact-londons-built-environment

[67] Energy Monitoring Reports, GLA, accessed September 2026, https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/energy-monitoring-reports

When it comes to salvage of existing materials, there should be more support within assessments to consider how sharing resources between developments can be enabled, and meanwhile use of space both on empty sites and in unoccupied buildings to support salvage should be supported.

The exemptions in the policy should be reviewed, although there is a distinct policy GLE3 for datacentres, given the concerns expressed about the carbon, waste and other impacts of data centres they should also be included in this policy.

The next London Plan should:

- support more optioneering and challenge of assessments of whole life-cycle carbon;
- support training of local officers so they can undertake or commission independent reviews of whole life-cycle carbon assessments;
- enable regular review of targets to increase them, ensuring that 'aspirational' targets continue to push improvements;
- support salvage by supporting the meanwhile use of land and buildings to support storage of salvaged materials;
- reduce exceptions to whole life-cycle carbon, including for energy-heavy buildings such as datacentres.

GHR5 Flood risk and drainage

Within these policies, there needs to be more joined up thinking about the implications of repeated drought conditions in Greater London. At the time of writing we are now into October and the hosepipe ban put in place in the summer shows no sign of ending.[68]

It is also necessary to enable Londoners to keep more planted green space as one of the key ways to reduce flood risk in London, which the London Fire Brigade provide some advice on already.[69]

However, although there is a drainage hierarchy, it is poorly applied for anyone living in large developments. For example, the drainage hierarchy has required new homes to often be built with a large retention tank to attenuate rainwater. However, that stored rainwater is then inaccessible during a drought to water nearby greenery, and reduce the impact of heat, and reduce fire risks. The climate change committee has said that: "there is now unequivocal evidence that climate change is making extreme weather in UK, such as heatwaves, heavy rainfall, and wildfire-conducive conditions." [70]

There are issues about how policies interact, in particular for the balance between the functions a roof can provide in a sustainable development. Though it's possible for a roof to be optimised

[68] Dry weather and drought in England: 25 September to 1 October 2026, Gov.uk, 5 October 2026, https://www.gov.uk/government/publications/dry-weather-and-drought-in-england-2026-summary-reports/dry-weather-and-drought-in-england-25-september-to-1-october-2026
[69] Planting and flooding | London Fire Brigade, London Fire Brigade, accessed September 2026, https://www.london-fire.gov.uk/safety/flooding/flood-prevention/planting-and-flooding/
[70] Progress in adapting to climate change: 2025 report to Parliament, Climate Change Committee, 30 April 2025, https://www.theccc.org.uk/publication/progress-in-adapting-to-climate-change-2025/

for solar power generation, green space and water harvesting it is rare to see those competing needs addressed. The GLA should commission further research and provide advice on how to balance these competing needs, with complementary design. Some research already suggests that a green roof can lower the temperature of solar panels and increase their output.[71]

The London Plan should:

- consider the balance between policies to capture and store rainwater, with the access to that water that may help support reduced water usage;
- link policies on managing heat risks in the urban environment with the support needed for planting, including access to harvested rainwater for the residents of large developments;
- consider the balance between uses of roof space to generate solar energy, provide green space and capture rain water, and ensure policy supports combined approaches that may be more effective.

GHR11 Cycle and car parking

I was surprised to see no mention of the specific needs of women who use bikes in the draft Plan. London Cycling Campaign (LCC) produced an in-depth report on what stops women cycling in London. Of the women surveyed, 88 per cent said they prefer cycling on protected cycle lanes or low traffic routes, or will not cycle without them. [72]

The report also identified that many women mentioned needing safe and secure bike parking and storage at key local destinations. Without these basic facilities, women will continue to be forced off the bikes they want to ride, and the Mayor won't achieve the modal shift he aims for.

Some of these needs could be directly addressed through planning guidance, specifically in the Development Management section of GHR11. Lighting and women's safeguarding while cycling must be included in the London Plan.

Disabled people's organisations have raised concerns that this policy does not provide a sufficiently robust framework to ensure that cycle parking is accessible and usable by Disabled cyclists, or that Disabled people who rely on cars as drivers or passengers can access sufficient and appropriately located Disabled parking. It also does not adequately ensure that measures to restrict car parking take account of whether accessible alternatives to car travel are actually available to Disabled people. The London Plan should provide policies to ensure cycle and Disabled parking are fully accessible to Disabled People.

Disability equality organisation, Inclusion London, is also concerned about the use of the Sustainable Access Measure (SAM) for determining car-parking standards, reflecting my own concerns about this new metric, as outlined above. It should be recognised that general sustainable transport connectivity cannot, by itself, demonstrate accessible connectivity for Disabled people. Failing to account for the accessibility of the journeys represented by SAM

[71] A green roof or rooftop solar? You can combine them in a biosolar roof, boosting both biodiversity and power output, The Conversation, 16 August 2023, https://theconversation.com/a-green-roof-or-rooftop-solar-you-can-combine-them-in-a-biosolar-roof-boosting-both-biodiversity-and-power-output-211347
[72] What Stops Women Cycling in London. London Cycling Campaign, Jan 2024 What-Stops-Womens-Cycling-in-London_FINAL.pdf

risks restricting parking on the basis of sustainable transport alternatives that some Disabled people cannot use. SAM should be revised so that it better reflects the accessibility and actual journey times experienced by Disabled people when walking, wheeling and using public transport.

The way boroughs are banded for cycle parking has the result of providing more challenging cycle parking requirements for those boroughs that already have greater cycling provision and lower numbers of car parking spaces, while baking in low expectations for cycling levels and bike parking need in the outer boroughs that still have lower levels of cycling and higher car use.

As shown above by the research from LCC, people need cycle provision before they start cycling. In Northwest, Northeast, East and Southeast London where cycle journeys are fewer, counterintuitively, the boroughs in these areas have been excluded from more stringent development requirements. This discrepancy will add to the widening gap in the number of journeys made by bicycle between non-cycling and already cycling areas, while not supporting the targets in the MTS.

The London Plan should:

- explicitly refer to safety and lighting in relation to enabling women to cycle by amending GHR11 Part A(1) to: "Development proposals should provide cycle parking that is fit for purpose, secure, well-located and well-lit. The area required for it, its location and access to it should be considered at the initial design stage, with the safety of women users considered. Applicants should demonstrate that there is sufficient space for the number of parking spaces required";
- provide policies to ensure cycle and Disabled parking are fully accessible to Disabled People;
- amend GHR11 Part B to: "The design and layout of cycle parking areas should provide sufficient spacing and manoeuvring space between stands, the right type and mix of stands including accessible spaces suitable for adapted, larger and non-standard cycles, and accessible, step-free access routes. Cycle parking and associated facilities should be designed to enable Disabled cyclists, including people using adapted and non-standard cycles, to access and use them independently, including through appropriate gradients, manoeuvring space and accessible entrances, doors and gates. The design, layout and provision of associated facilities should be in accordance with the London Cycling Design Standards";
- amend GHR11 Part E to: "If developments cannot provide all the cycle parking required by parts C or D on site, they should provide a proportion in alternative locations, through alternative forms of provision or through contributions to this, subject to borough approval. Where cycle parking is provided in alternative locations or through alternative forms of provision, it should provide an equivalent level of accessibility, including provision suitable for adapted, larger and non-standard cycles, and should be located as close and conveniently to the development as practicable on an accessible step-free route";
- Amend GHR11 Part H to: "Car parking should be minimised, including as needed to optimise the use of a site or to mitigate impacts on the local road network. Car-free and car 'lite' development should be the starting point for development proposals (apart

from disabled persons' car parking which should still be provided in accordance with parts J and K). If a need for car parking for a development is identified, the use or control of existing on-street, other public or shared parking should first be considered. Major residential and mixed-use developments should be required to actively consider shared mobility within parking and transport strategies, including publicly accessible, dedicated car club bays where appropriate. In applying Sustainable Access Measure scores to decisions about car parking, account should be taken of whether walking, wheeling and public transport journeys are accessible to Disabled people. This should include consideration of the accessibility of pedestrian and wheeling routes, step-free access to Underground and rail stations and interchanges, accessible boarding and interchange arrangements, and whether accessibility barriers result in substantially longer or more complex journeys. Where these factors materially reduce the availability of accessible sustainable transport alternatives, this should be reflected in the assessment of parking need";

- support cycling provision in all parts of London, particularly where cycling numbers are currently low;
- amend GHR11 Policy aim to: "to facilitate cycling and limit car parking in new development to increase bicycle journey numbers and reduce car use to enable optimisation of sites, particularly in areas with lower existing cycle use and higher car use";
- amend the cycle space requirements in tables 5.3, 5.4 and 5.7 by combining Bands 3 and 4 to bring in higher requirements of cycle parking in Band 4 boroughs to encourage cycling and reduce private car usage;
- amend GHR11 rationale 5.126 to: "Quality cycle parking enables cycle ownership, which is a key factor in enabling and encouraging more Londoners to cycle, alongside other models e.g. cycle hire, particularly in areas of lower cycle journey numbers. This contributes to the increased use of sustainable modes of transport, and the core objective of the Mayor's Transport Strategy to support mode shift. It also contributes to Healthy Streets indicators, the health of Londoners and a range of other objectives. The minimum standards provide for current ownership and use, while also allowing for room for growth in cycling especially in parts of outer London";
- support shared mobility through car parking and amend GHR11 Implementation, 5.124 to: "All major residential and mixed-use developments should be required to actively consider shared mobility underpinned by appropriate evidence of connectivity within parking and transport strategies including dedicated car club bays both on-street and within developments, if publicly accessible. The level and design of provision should not add to the vehicle dominance of street environments";

6. Place visions and place-based approaches

PV1 Brownfield First Opportunity Areas (BFOAs)

I am concerned PV1 does not sufficiently reckon with the well-documented democratic deficit of Opportunity Areas, nor the potential harms of these designations to existing local communities.

Opportunity Areas have faced significant critiques from local residents, representative organisations and the London Assembly. In 2022, the cross-party London Assembly Planning Committee raised concerns about the lack of resident involvement in Opportunity Area designation and development, and their tendency to drive displacement of existing businesses and people.[73] Community planning organisation Just Space, which represents more than100 community groups around London, has levelled extensive criticism at Opportunity Areas over a number of years, including how they have overridden the needs, character and diversity of specific local areas through unrealistic housing targets, a lack of resident engagement and wider democratic accountability, and an absence of monitoring.[74] These criticisms should be accounted for in this Draft Plan. Despite this, the Mayor has not commissioned an in-depth review of the impact of Opportunity Areas, and monitoring of outcomes via the Annual Monitoring Report is very limited.

The Mayor's failure to acknowledge the problems of OAs is reflected in this Plan, which does not respond to these extremely well-evidenced criticisms. B(5) notes that the: "involvement of community voices, particularly those from underrepresented groups, should be sought." This is a watering down of the 2021 policy on resident involvement, which was already a weak policy that did not introduce a genuine commitment to community-led planning, nor did it expound on the key role Neighbourhood Planning should play.[75]

B(4) says quality design "should help create value and local benefit… and recognises the role of heritage, culture and local identity in place-making." This does not explicitly recognise the *existing* value and identities of places within BFOAs, nor the merits of existing place-based design that create value and local benefit. Given that BFOA designations cover some of the poorest and most diverse areas of London, by virtue of being located in post-industrial locations and places of historic underinvestment, it is extremely concerning that this policy risks overriding the existing culture and community of these areas. This may be incredibly detrimental, while producing limited benefits in terms of meeting need, as described above.

The London Plan should:

- The new designation of Brownfield First OAs should demand a reset of the planning frameworks and more democratic approach taken;

[73] Letter to the Mayor on Opportunity Areas and Housing Zones. London Assembly Planning and Regeneration Committee, March 2022 https://www.london.gov.uk/press-releases/assembly/opportunity-areas.
[74] Just Space memorandum on Opportunity Areas. Just Space, February 2022 just-space-memorandum-on-opportunity-areas-25-feb-22.pdf. Alternative London Plan for a Caring City. Just Space, April 2026, pp.18-9, https://justspace.org.uk/wp-content/uploads/Justspace_Alt_Plan-2026.pdf.
[75] Response to the Draft London Plan. Siân Berry, London Assembly, March 2018, p.7, https://www.london.gov.uk/programmes-strategies/publication-Siân-berry-response-draft-london-plan.

- requirement for community-led planning and co-production throughout designation and plan-making (including OAPFs and relevant Area Action Plans (AAPs) and Supplementary Planning Documents (SPDs)). The role that Neighbourhood Planning should play should be expounded in the Policy. Evidence of net community benefit should be detailed in a Mayoral Statement of Community involvement;
- make all OA Planning Frameworks subject to public examination;
- demand resident co-production in the making of plans for BFOAs, including identifying places, businesses and cultural practices of specific importance for existing communities.

PV3 Town centres and high streets

While we welcome the increased recognition in the draft Plan of street markets as important cultural and community sites, the protections do not go far enough to protect these and other cherished and irreplaceable spaces.

It is good to see increased recognition of street and covered markets in this policy, via part E and rationale paragraph 6.27. The need for better recognition in planning of these vital cultural and community spaces has been argued for in our response to Towards a New London Plan[76], in a recent cross-party investigation by the London Assembly Planning Committee[77], academic researchers[78], and many self-organised community groups around London[79]. It is good to see an acknowledgement of the need to make better use of empty properties, via 'meanwhile use' and low-cost workspace, a long-standing ask of former Assembly Member Siân Berry[80], echoed last year in a report of the Economy committee.[81]

But given the agenda for rapid intensification of land and 'high-growth' economic activity set by the rest of this draft Plan, I am concerned the protections for markets and high streets are not sufficient. Part E calls on LPAs to: "designate street and covered markets on their Policies Map (…) and develop policies to retain and enhance them." This policy does not encourage the community right to create designations for culturally significant retail spaces, which is important given LPAs will not necessarily share the views of the value of affordable retail space

[76] Rethinking London's Future: Zoë Garbett AM response to the Mayor's London Plan consultation. Zoe Garbett, London Assembly, June 2025, pp.23-25, https://www.london.gov.uk/sites/default/files/2025-06/Response%20to%20Towards%20a%20new%20London%20Plan_June%202025_0.pdf.
[77] Social value in planning and regeneration: Knowing the price of everything and the value of nothing. Planning and Regeneration Committee, London Assembly, April 2025, https://www.london.gov.uk/sites/default/files/2025-04/Social%20value%20in%20planning%20and%20regeneration%20report%20April%202025.pdf.
[78] E.g. Queen's Market: A successful and specialised market serving diverse communities in Newham and beyond. Myfanwy Taylor, Sophie Watson, Sara González, Lisa Buckner, Andy Newing and Rosie Wilkinson, Markets 4 People and University of Leeds, https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2021/06/210531-M4P-Queens-FINAL.pdf.
[79] Protect our Places Coalition. Latin Elephant, https://latinelephant.org/protect-our-places/.
[80] London's dead spaces: Bringing them back to life. Siân Berry, London Assembly, https://www.london.gov.uk/sites/default/files/2022_06_dead_spaces_sian_berry_am_final.pdf.
[81] At a crossroads: London's high streets. London Assembly Economy, Culture and Skills Committee, April 2025, https://www.london.gov.uk/sites/default/files/2025-04/Economy%2C%20Culture%20and%20Skills%20Committee%20-%20High%20Streets%20report%20-%20FINAL.pdf.

set out in this draft policy. It is also not enough to just give communities the toolkit they need to resist the loss of these valuable spaces.

Community groups and market traders facing displacement and gentrification pressures have been calling for stronger protections in the London Plan they can refer to directly. The Protect our Places coalition (representing 11 community groups from across London fighting the loss of markets and other low-cost retail spaces) called on the Mayor last year to provide specific protections in the London Plan that communities can draw on directly. This was echoed in recommendations agreed by the London Assembly Planning Committee in April 2025, calling on the new London Plan for stronger protections and community powers of designation.[82]

Without stronger frameworks for the people who rely on low-cost retail spaces – traders and customers alike – to directly resist displacement, the Mayor will not be able guarantee town centres will be the 'vibrant, resilient, accessible and inclusive places' he desires, and London will be much worse off for it.

The London Plan should:

- change part A to introduce a new point 10, reflecting Recommendation 10 of the London Assembly Planning Committee report cited above, that says, "development proposals that result in harm to or loss of low-cost retail space and high social value businesses as part of a locally specific retail cluster (like street markets, covered markets, shopping centres and arcades) should be resisted, even where individual units can be re-provided";
- change part E to have an additional sentence reflecting Recommendation 7 of the London Assembly Planning Committee report and Policy 20 of the Just Space Alternative London Plan, that says: "Communities should have the right to create new designations for culturally retail clusters. LPAs should encourage this process through community-led, social value audits of its town centres and high streets in collaboration with traders, businesses and local communities".

PV6 Metropolitan Open Land (MOL)

PV7 Sustainable development and enhancement of the Green Belt

Green Belt and Metropolitan Open Land are unique, invaluable assets for London.[83] Any release of Metropolitan Open Land or changes to the Green Belt must be very carefully considered and consulted upon – and demonstrated to be absolutely necessary.

Despite this draft Plan taking a 'brownfield first' approach, this risks only being words given the many ways the draft policy enables building on green space. HN1 sets housing targets that shows brownfield and greenfield targets to be on the same footing and equally prioritised. Via

[82] Social value in planning and regeneration: Knowing the price of everything and the value of nothing. Planning and Regeneration Committee, London Assembly, April 2025, https://www.london.gov.uk/sites/default/files/2025-04/Social%20value%20in%20planning%20and%20regeneration%20report%20April%202025.pdf.
[83] Gold plate our Green Belt. Carolie Russell, London Assembly, February 2020, https://www.london.gov.uk/sites/default/files/gold_plate_our_green_belt_caroline_russell_am_feb_2020.pdf.

these allocations and the Broad Locations for Growth (BLG) designations, Green Belt development has become an assumed part of the Plan's spatial vision for London. This is incredibly concerning as the draft Plan has not effectively demonstrated that housing need cannot be met on brownfield sites or within the existing stock, as I have laid out in response to HN1.

Green Belt in better connected areas is being primed for development. Whilst the focus on transport connections may seem like it supports the Mayor's Transport Strategy (MTS) aim for 80 per cent of trips to be by walking, cycling and public transport, where new developments are far away from London in distance, they risk being new dormitory towns, with little local activity. This risk is heightened by the loss of social infrastructure support in the plan (for more details see the response to MBUL1).

The suggestions in PV7A of Green Belt sustainable locations provide a series of simple exceptions to protections which are concerning. The Local Plan and New Town exceptions abdicate the responsibility to another body and express no strategic plan for the protection of the green belt. The exceptions related to distance from transport for both residential and industrial proposals provide too broad an area in which development would be permitted, and risk encouraging development contrary to the MTS. The exceptions relating to data centres risk unlocking huge areas of land on the grounds of heat-networks, which increases the potential footprint of new development in the Green Belt to be both land used for new homes, at lower densities with less sustainable transport use, and then for land nearby to be used for data centres to heat them. This is contrary to the principle of using less heat in homes, and new homes could instead be built to have zero or low bills and use renewable energy rather than waste heat.

The next London plan should ensure any release of land from Metropolitan Open Land or changes to the Green Belt are undertaken only where absolutely necessary, after full engagement on any process with full safeguards in place and only where there is a benefit to the biodiversity and green space in the local area, without depending on net-gain elsewhere.

There may be significant social and environmental costs of developing on the Green Belt. This Plan must better demonstrate how it intends to avoid this eventuality and deliver the homes we need in a more sustainable way.

The London Plan should:

- introduce a policy that makes brownfield-first a planning requirement;
- ensure any MOL or Green Belt release is absolutely and demonstrably necessary, while implementing sufficient safeguards against unnecessary safeguards and only where there is demonstrable gain to biodiversity and green space, without being dependent on net-gain elsewhere.