



James Small-Edwards AM
Chair of the Planning and Regeneration Committee

Sir Sadiq Khan
Mayor of London
(Sent by email)

20 June 2025

Dear Sadiq,

Towards a New London Plan, submission from the London Assembly Planning and Regeneration Committee

The publication of High-Level Document (HLD) '*Towards a New London Plan*' in May 2025 kickstarted the next phase of work to deliver a new London Plan in 2027. It is described as setting out "key new ideas that the new plan might include for you to consider and comment on".

This is the submission of the London Assembly Planning and Regeneration Committee to the consultation. It is informed by evidence the Committee gathered in its meeting on 9 June alongside a body of past work with relevance to the London Plan, including: *Unlocking development in London*; *Do tall buildings work in London?*; *Social value in planning and regeneration*; and *Shaping the future of the London Plan*. See also our letters regarding the *Future of Planning* and the *draft London Plan Guidance (LPG) on Housing Design Standards and Small Site Design Codes*. Over the course of these investigations, the Committee has set out many recommendations to the Mayor, to which the Committee would point as still relevant.

This response focuses first on three priority policy areas for the next London Plan before addressing additional points. The priorities in this response are:

1. Brownfield first and the Green Belt
2. The planning process
3. Growth policies

SECTION 1: Priority points:

1. Brownfield first *(responding to points 2.1, 2.9 and 2.10 in the HLD consultation)*

The Committee recognises the scale of the challenge to build London's nationally established housing need of 88,000 homes per year is huge. In our *Unlocking Development in London* investigation, we heard how annual rates of housebuilding in the past 20 years have never risen above the current London Plan target of 52,000 and the average number of homes built between 2019 and 2024 was just 32,000. In that report, we made recommendations urging the GLA to maximise opportunities for affordable housing on GLA and TfL brownfield land and to conduct a thorough review of existing brownfield registers.¹ These recommendations are still relevant to the proposals contained within the HLD. Given these challenges, we support the principle set out in the consultation of a brownfield-first approach, alongside the GLA's ongoing work to identify — and unlock — suitable sites through the Land4LDN programme.

Accompanying the brownfield-first approach, the HLD also introduces the possibility for targeted green belt release. While the Committee does not hold a shared position on the principle of Green Belt land release in London, we do have a shared view that when Green Belt land is opened for development, developers will be disincentivised to bring forward applications for more complex brownfield sites that have higher land values or may require costly remediation. This is due to the fact that in many cases Green Belt land will have lower land values. As the Deputy Mayor told us "It would not be legally possible to exhaust all brownfield supply before Green Belt came forward."²

Given the factors we've raised, we believe that "brownfield first" will likely become a policy in name only. Given that we have heard that "we cannot wait for brownfield sites to be completed before we begin to accept applications for the Green Belt", the GLA must bring forward some clarity on how its brownfield first policy would actually work in practice.

Recommendation 1: The GLA should set out how 'brownfield first' would work in practice.

2. Green Belt release *(responding to points 2.9 and 2.10 in the HLD consultation)*

We recognise that changes to the National Planning Policy Framework (NPPF) require the GLA and London boroughs to assess Green Belt land in order to meet housing targets.³ The GLA is currently working with boroughs to carry out a Green Belt review. The Committee heard from Lisa Fairmaner (Head of London Plan, Greater London Authority) that, "In terms of the Green Belt review, we have not taken a decision [on when it will be published] because it will depend on when it is ready".⁴

The Committee notes that the Mayor is undertaking a Green Belt review. We encourage greater clarity and transparency in how land is assessed for potential re-designation as Grey Belt or for development, to build public confidence in the process.

¹ Planning & Regeneration Committee, *Unlocking Development in London*, March 2025

² Planning & Regeneration Committee, *Transcript to meeting of June 9, panel 2*, p. 25

³ Ministry of Housing, Communities, and Local Government *National Planning Policy Framework* December 2024

⁴ Planning & Regeneration Committee, *Transcript to meeting of June 9, panel 1*, p. 17

While we understand the broad principles being applied, further detail would support greater understanding of the criteria being used. Given that the outcomes of this review will influence how housing targets are apportioned across London boroughs, it is important that the process progresses at pace and with clear communication.

Recommendation 2: The GLA should set out its assessment criteria for the Green Belt review and provide timescales for its completion.

3. Metropolitan Open Land (MOL) *(responding to point 2.11 in the HLD consultation)*

The HLD proposes that Metropolitan Open Land (MOL) could be separated from the Green Belt and receive different protections.

We would like to know more about how separating MOL from the Green Belt would work in practice.

Recommendation 3: The GLA should set out how Metropolitan Open Land (MOL) will be protected, if it is decoupled from the protections of Green Belt.

4. The Planning Process *(responding to point 1.5 in the HLD consultation — and more widely)*

In our investigation into *Unlocking development in London* we heard of the ‘perfect storm’ of challenges for London’s housebuilding sector in recent years.⁵ The Committee recognised that for maximum impact, changes to the London Plan need to happen within a broader context of changes to the economy and wider planning system.⁶

The planning process — alongside all those other things — also needs to change. We need more planners, and the planning system needs simpler processes. We acknowledge that some of these issues go beyond the scope of the London Plan policies, but the overall composition of the London Plan should be cognisant of that fact and not look to introduce vast numbers of new policies. In our *Unlocking Development in London* report, we called for the next London Plan to be easier to follow and to provide clearer guidance to local authorities on mandatory requirements versus areas where they have flexibility.

We heard from Sarah Bevan (Director, Planning and Development, BusinessLDN) support for localised action plans and opportunity area [OA] planning frameworks, which aid “local buy-in within each local authority”. She told us that “early opportunity areas had a really bespoke opportunity area planning framework” that were “very location-specific”, and “provided a really good vehicle for creating the specialist clusters for the growth sectors.” She lamented that more recent OA plans “became more generic” and lost these benefits.⁷ Similarly, Rob Anderson (Research Director, Centre for London) told us that “the current formal planning structure for the city does not create the most fruitful space for those kinds of discussions about that cross-boundary.”⁸

⁵ Planning & Regeneration Committee, *Unlocking Development in London*, Mar 2025, p. 5

⁶ Planning & Regeneration Committee, *Unlocking Development in London*, Mar 2025, p. 5

⁷ Planning & Regeneration Committee, *Transcript to meeting of June 9*, panel 1, p. 5

⁸ Planning & Regeneration Committee, *Transcript to meeting of June 9*, panel 1 p. 8

Recommendation 4: The next London Plan should support the creation of localised action plans and bespoke opportunity area planning frameworks. The GLA should facilitate cross-boundary discussions to improve the planning process.

5. Affordable workspace *(responding to point 3.10 in the HLD consultation)*

Through the Committee's work on social value in planning and regeneration, we heard of how important affordable workspace can be to incubating the kinds of activities that deliver social value in London. We therefore welcome the HLD's recognition that affordable workspace can help provide "valued cultural and community space and reduce existing local businesses from being displaced."⁹ We reiterate the recommendations we made in our report *Social value in planning and regeneration: Knowing the price of everything and the value of nothing* (May 2025).

But we have also heard scepticism about current policies on affordable workspace in practice. Sarah Bevan told us that the London Plan "very clearly talks about the need for delivery [of affordable workspace] to be locally led." However,

"what has happened on the ground is that the boroughs have started to introduce very generic policies. It tends to be that there is a borough-wide policy, and you end up with some fairly bland but probably very high-quality office space in a lovely, sparkly new office building and it is not necessarily what is needed."

Instead, Ms Bevan argued that contributions towards directing affordable workspace provision into a hub would "tie in neatly with the specialist clusters that the Growth Plan is trying to establish and promote and would be a much better use for developer contributions and more effective."¹⁰

Recommendation 5: The GLA should evaluate its policy for affordable workspace in the current London Plan and identify how a new policy could incubate and protect long-standing businesses that deliver high social value.

SECTION 2: Additional points

Additional points we would like to make regard the policy areas of: Build to Rent (BTR), skills, infrastructure-first development, playing fields, community-led housing, design standards and post-occupancy evaluation (POE).

6. Build to Rent *(responding to point 2.15 in the HLD consultation)*

The Committee would like more data on the BTR sector. Committee Members have concerns around insufficient delivery of genuinely affordable homes within BTR schemes, especially at London Living Rent or social rent levels. Some Members also have concerns that BTR developments inflate land values. There were also concerns that many BTR properties are too small or otherwise unsuitable for families and therefore do not build long-term community in London's neighbourhoods. In our investigation, *Do tall buildings work in London?*, we called for the GLA to carry out assessments of housing typology needs in London. The next draft of the London Plan should be accompanied by

⁹ HLD p. 50

¹⁰ Planning & Regeneration Committee, *Transcript to meeting of June 9*, panel 1, p. 13

this analysis. This should be complemented by analysis of how the BTR sector is impacting rent levels, affordability, occupancy, and tenant demographics.

Recommendation 6: The GLA should undertake an analysis of the Build to Rent sector in London, focusing on rent levels, affordability, occupancy, and tenant demographics. A lack of transparent data hinders effective oversight. Regular, standardised reporting from Build to Rent operators should be required to assess compliance with policy goals and ensure developments genuinely meet London's housing needs.

7. Skills

The Committee is concerned that there aren't enough skilled construction workers to deliver the 88,000 homes a year and industrial and infrastructure development set out in the ambitions of the London Plan. Skills gaps would create delays. We heard from Rob Anderson that there are "skills deficits in key sectors, we are seeing a lack in particular in construction".¹¹

Lisa Fairmaner told the Committee about a "real cliff edge of retirement in a lot of the construction industry; same goes with building regulations and building inspectors." Ms Fairmaner highlighted section 106 arrangements for bringing skills into the sector, and a pooling arrangement across local authorities and across different schemes.¹² The ambitions in the next London Plan will hinge on the availability of skilled workers in the construction sector. Understanding the pinch points and pipeline of skilled workers available will therefore be hugely important.

Recommendation 7: Across the lifetime of the next London Plan, the GLA should provide regular reports on London's construction skills base, identifying progress and gaps across the range of skills needed to support development and achieve the Plan's ambitions.

8. Infrastructure-first development

The Committee is concerned that housing will be developed without the infrastructure to support it, both transport links and utilities such as water and electricity. We heard from Rob Anderson that he had concerns about "Infrastructure constraints, particularly travel [and] orbital connectivity". Mr Anderson asked, "what might the West London Orbital unlock for us and what might the Docklands Light Railway extension unlock for us?"¹³ We note that the Mayor had some infrastructure asks which were not forthcoming in the recent spending review.¹⁴ As Councillor Ergin Erbil said, "It has to be an infrastructure-first approach."¹⁵

The Committee sees great value in the potential of London, and the importance of the London Plan as a tool for shaping the city. We submit these comments to the *Towards a new London Plan* consultation for your consideration.

¹¹ Planning & Regeneration Committee, *Transcript to meeting of June 9*, panel 1, p. 2

¹² Planning & Regeneration Committee, *Transcript to meeting of June 9*, panel 1, p. 10

¹³ Planning & Regeneration Committee, *Transcript to meeting of June 9*, panel 1, p. 12

¹⁴ Mayor of London, *Mayor of London statement following Government Spending Review*, June 2025

¹⁵ Planning & Regeneration Committee, *Transcript to meeting of June 9*, panel 2, p.27

The Committee would welcome a response to this letter by 20 July 2025. Please send your response by email to the Committee's Clerk, Saleha Fazal (Saleha.Fazal@london.gov.uk).

Yours,

A handwritten signature in black ink, appearing to read 'JSE', with a large, sweeping flourish extending from the bottom left.

James Small-Edwards AM
Chair of the Planning and Regeneration Committee