



# Rethinking London's future

**Zoë Garbett AM response to the Mayor's London Plan consultation**

Green Party London Assembly Member  
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# Response to Towards a new London Plan

**Zoë Garbett, Green Party member of the London Assembly**



**20 June 2025**

This London Plan has been formed in the dark looming shadow of the London Growth Plan's published earlier this year – a document with a growth-at-all-costs mentality, barely informed by public consultation and facing little to no scrutiny in its development. The London Plan must re-establish the principle of **good growth** if we are to have any chance at addressing the crisis of affordability, increasing displacement, particularly of families, and the climate and ecological emergencies.

London is gripped with inequality. Now more than ever we need a planning framework that prioritises public good and inclusive development over and above all else. Where building social homes is a key function of housing development, not a burden on it. Where the Green Belt is protected and expanded, not built on with for-profit development at irreversible cost. Where affordable workspace is a recognition of the wider social and economic function of small businesses, not an obstacle to economic development. And where well-connected, sustainable and accessible transport networks are the default, not the exception.

The model of development in London, and across the UK, is broken. It has created a housing market completely skewed away from the needs of Londoners, based on a land value market that incentivises profiteering over public good. There has been a total failure in provision of accessible homes for disabled Londoners which must be rectified. Not meeting targets does not mean the Mayor should consign hard-won policies to a bonfire of red tape, instead he should protect these policies that have demanded a higher standard for Londoners.

Given the Mayor has not consulted on any other overarching city-wide strategy for these matters, this makes the London Plan consultation crucial in hearing from Londoners and their representative organisations. The future of our city must be coproduced with the people who live here.

This document responds to the publication in May 2025 of the Mayor's Towards a New London Plan. More detailed comments will be needed when each of the Mayor's proposed strategy documents and the new London Plan itself are published.

## 2. Increasing London's **affordable** housing supply

Our housing crisis is the result of unaffordability, not an overall shortage of supply. Safe and secure housing is unaffordable to too many Londoners, while there are more than twice the number of underoccupied than overcrowded homes. This leaves people being forced to decide between living in unsuitable housing or leaving their communities, with many forced into homelessness.

Unaffordability has been driven by the financialisation of housing – in particular, the appetite for housing and land as an investment asset. This means the housing market has become wildly disconnected from its function as a consumption good, whether renting or buying, with house price growth rapidly outpacing income growth since the 1990s. The only bulwark against this trend has been social housing, which remains the only form of genuinely affordable housing we have, whose costs are linked to local incomes rather than the market.

The solution to this crisis is increasing our social housing supply, while dismantling the speculative model of housing development. The London Plan alone cannot fix this alone, but it can help. It must not fall prey to the notion that loosening or shedding its policies to open up more market development will fix our crisis; this frame shifts focus from the complex questions about how we got into this crisis, and how we get out of it. Echoing the OBR, the consultation document itself notes that building more market housing will have little impact on improving affordability. But the London Plan must also refuse to accept the notion that developing high rates of market housing is the necessary price to pay for delivering affordable housing and digging us out of this mess in the long-term. Permitting schemes with high levels of market housing will drive up land values without meeting London's most pressing housing need, making future developments with high levels of social housing even less 'viable' – and so the cycle continues. The London Plan should not indulge this race to the bottom.

Instead, the London Plan should demand more for Londoners. It must be more steadfast in its pursuit of more social housing. It must better protect the existing social housing stock. It must demand higher minimum levels of social housing and be more robust in defending these targets against erosion from 'viability' mechanisms. It must demand more transparency from developers. Done right, this can achieve real change in the policy landscape for building new homes and start re-shaping the wider housing and land market in our city. The rest of this chapter responds to specific sections of the consultation document, followed by areas not covered in the consultation document.

The rest of this chapter responds to specific sections of the consultation document, followed by areas not covered in the consultation document.

### 2.1 A brownfield first approach



Neither the Mayor nor central Government have adequately demonstrated that London's housing need cannot be met on brownfield sites. In theory, a brownfield-first approach will restrict Green Belt development until brownfield sites have been used to their maximum potential. But the consultation does not clarify how this policy might work in practice.

This is not to say all brownfield land is automatically appropriate for development. The consultation document makes no mention of either contaminated land or remediation. Again, this policy should be accompanied by a clear process and support for contaminated land and remediation of it.

There are rapidly increasing concerns about contamination of land, water and air by substances that are polluting our natural environment. Recent concerns about PFAS (per- and polyfluoroalkyl substances) or commonly referred to as 'forever chemicals', have added to earlier concerns about pollution from other chemicals, industrial processes and landfills – some of which are illegal. PFAS can build up in the human body as exposure mounts leading to health complications, contaminated ecosystems and alter the behaviour of wildlife.

Contaminated land is not just a risk to those living on such land. Nearby waterways can be affected by run-off, and seen in the tragic death of the seven-year-old child Zane Gbangbola, flooding can bring new dangers to surface from existing waste sites. In 2024, The London Assembly passed a motion brought by Zack Polanski AM in support of Zane's Law.

Many former industrial sites are now large brownfield sites, sometimes partially redeveloped into light commercial use like retail parks, and are subsequently being used for large scale housing development due to their strong public transport links. Reusing former industrial sites for housing and other purposes should be positive for London as a whole, but concerns have repeatedly been raised by local residents about problems with the remediation of contaminated land in London.

Remediation of contaminated land should be a positive step to remove human-made pollution from the natural environment, but a lack of oversight caused by a lack of resources in local government and poor practice by some developers means that there is often no effective oversight of these works. Odours that can be released during remediation of tarry wastes are perceptible by the human nose at very low concentrations, which has led to concerns about health impacts from Londoners living by sites undergoing remediation.

Residents who raise concerns feel ignored and unable to be supported. In addition, these residents feel stressed by the experience of having to advocate for themselves.

### **Key recommendations:**

- The next London Plan must set out how a brownfield-first approach will work in practice.
- The next London Plan must now respond to the extensive concerns raised about the environmental health impacts of brownfield land, ensure that remediation is effective, and that residents are heard on their concerns.

## Further evidence

The demand for housing as an investment', UCL Institute for Innovation and Public Purpose. Josh Ryan-Collins, October 2024  
<https://www.ucl.ac.uk/bartlett/publications/2024/oct/demand-housing-investment>

The Invisible Land, IPPR. Luke Murphy, August 2018  
<https://www.thinkhouse.org.uk/site/assets/files/1567/ippr0818.pdf>

The residents uniting against 'forever chemicals' polluting their town. Channel 4 News, Jan 2025 <https://www.channel4.com/news/the-residents-uniting-against-forever-chemicals-polluting-their-town>

Zane Gbangbola: Concern over experiments near home of boy who died. BBC News, Apr 2024 <https://www.bbc.co.uk/news/uk-england-kent-68635971>

Zane's Law. London Assembly Motion by Zack Polanski AM, November 2024  
<https://www.london.gov.uk/motions/zanes-law>

Environmental impacts of firefighting foam MQ 2022/3948. Zack Polanski AM, November 2022 <https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/environmental-impacts-firefighting-foam>

Thames Water Utilities Limited – AMP8 PFAS Strategy. Drinking Water Inspectorate, November 2024 <https://dwi.gov.uk/water-companies/improvement-programmes/thames-water-improvement-programmes/tms-2023-00012-v2/>

Revealed: drinking water sources in England polluted with forever chemicals. The Guardian, January 2025 <https://www.theguardian.com/environment/2025/jan/16/the-forever-chemical-hotspots-polluting-england-drinking-water-sources>

Ardmore stops work on £75m scheme over smell complaints. Construction News, April 2024 <https://www.constructionnews.co.uk/buildings/ardmore-stops-work-on-75m-scheme-over-smell-complaints-16-04-2024/>

Gasworks remediation in the UK – a remediation contractor's perspective IAEG2006 Paper number 63. James Baylis and Douglas Allenby, 2006  
[https://media.geolsoc.org.uk/iaeg2006/PAPERS/IAEG\\_063.PDF](https://media.geolsoc.org.uk/iaeg2006/PAPERS/IAEG_063.PDF)

## 2.3 Opportunity Areas

In the London Assembly Planning Committee's report, *Unlocking Development in London*, the Assembly expressed concern that Opportunity Areas (OAs) are not delivering on their potential in relation to affordable housing delivery.

This criticism builds on long-standing criticism of OAs from community organisations. Just Space, a grassroots network of community groups around London who convene to discuss planning concerns, published their review of OAs in 2023. Their concerns include low levels of affordable housing delivery, displacement and exclusion of existing residents, inflationary impacts on land values, and a lack of accountability around decisions made.

### **Key recommendations:**

- The next London Plan should be informed by a comprehensive review by the Mayor of the monitoring, effectiveness, transparency and democratic control of OAs.
- The next London Plan should require genuine community co-production throughout development of sites in OAs, and all resulting planning frameworks should be subjected to Public Examination.

#### **Further evidence**

Unlocking Development in London. London Assembly Planning and Regeneration Committee, March 20205 <https://www.london.gov.uk/sites/default/files/2025-03/P%26R%20Cttee%20UDIL%20report%20-%20FINAL.pdf>

Opportunity Areas in London Planning: Just Space draft review. Just Space, 2023 [https://justspace.org.uk/wp-content/uploads/2023/05/opportunity-areas\\_-just-space-review.pdf](https://justspace.org.uk/wp-content/uploads/2023/05/opportunity-areas_-just-space-review.pdf)

## **2.4 Central Activities Zone**

Converting office space to housing risks creating unsafe and unsuitable homes with no energy efficiency measures, minimum accessibility requirements, and no access to green space or local amenities.

### **Key recommendations:**

- The next London Plan must introduce strict quality standards and safeguards for any office space to be converted to housing, including use class E.
- The next London Plan should prioritise bringing redundant office space back into use as affordable workspace with social leases.



### Further evidence

Inside Housing: The Case Against Permitted Development Rights. Sally Roscoe, February 2023 <https://www.insidehousing.co.uk/comment/the-case-against-permitted-development-rights-80110>

These Are Homes. Town and Country Planning Association, February 2023 <https://www.tcpa.org.uk/resources/these-are-homes-photobook/>

## 2.5 Town centres and high streets

Development in town centres and high streets must be cognisant of the displacement and gentrification dynamics of new market housing. An influx of new market housing to an area, particularly in the absence of substantial accompanying levels of social housing, can both directly and indirectly significantly inflate local rents demanded by both residential and commercial landlords.

In the case of the latter, higher rents can lead to the displacement of long-standing businesses and amenities catering to a lower-income people in place of amenities serving a higher-income population. In turn, this can drive out local and long-standing businesses who are integral to the local community.

The GLA's own *Housing Briefing Note* notes, the risk of gentrification is tied to changes in local amenities and where new housing is built:

“Building market-rate homes only in low-income areas will induce higher income households to move into those areas, potentially increasing gentrification pressures. These pressures will be greater if the new homes are accompanied by significant improvements in local amenities.”

Many of these existing amenities and low-turnover businesses, like barbershops and market stalls, have a social function far beyond the revenue they generate. They may provide low-cost goods and sociable meeting spaces for the community and can often be instrumental in local identity and culture.

Many of these clusters have significance across London, not just in their area. For example a number of groups of longstanding LGBTQ+ businesses, and well as culturally important places such as Chinatown, Brixton, Seven Sisters, Denmark Street and Brick Lane – each of which holds particular significance for specific ethnic or cultural communities across London. These areas of ‘emerging heritage’ form a key part of London’s character as a diverse, cohesive, tolerant and global city but are rarely old enough to qualify for official heritage protection, especially as their traditions often depend more on custom and usage rather than in physical features.

Despite their cultural significance and value, they are incredibly vulnerable to speculative development. For instance, for decades, Elephant and Castle hosted one of the biggest Latin American communities in London, around which evolved an ecosystem of shops and other businesses catering to this diaspora and becoming a famous and invaluable centre of Latin culture in the city. Over the last ten or so years, a massive regeneration project has been transforming the area. A six-year campaign from local campaigners managed to secure temporary workspace for many traders supporting the low-income local community, but many traders were not relocated, many do not have a guarantee of returning to the newly developed sites and many have since gone out of business. These businesses – the cultural and economic lifeline of this community – have been displaced and the area irrevocably changed.

The next London Plan must pay greater attention to the unique value of its emerging heritage and its social and economic function in making London a multicultural city.

### **Key recommendations:**

- The Plan should ensure high levels of social housing are mandatory in development in town centres that support low-income communities, to help offset the gentrification risk of new market housing.
- The Plan should build on the efforts of some boroughs by defining areas of ‘emerging heritage’ that have local distinctiveness and a London-wide significance. These should be given similar protections to conservation areas, with a statement of what characterises the area’s distinctiveness, support to preserve and enhance its unique characteristics and protection against changes of business use away from what has become traditional.
- The Plan should implement an official ‘right to return policy’ for all SMEs impacted by regeneration with special consideration given to CIC, social enterprises, not-for-profits and charities. As part of this policy, rents should remain the same for existing businesses before and after development. The developer should cover any moving costs for businesses that wish to return.

#### **Further evidence**

Relocated traders map. Latin Elephant, accessed May 2025

<https://latinelephant.org/519-2/>

Housing Research Note. London Datastore, August 2023

<https://data.london.gov.uk/housing/research-notes/hrn-10-2023-the-affordability-impacts-of-new-housing-supply-a-summary-of-recent-research/>

## **2.6 Industrial land**

The London Plan must ensure industrial land and workspace are protected far better than they have been in recent years. Industrial capacity, integrated into our city, is vital to

developing a resilient and diverse economy. The loss of industrial land to housing has led to the knock-on impacts of rising land values and rents, the squeezing of important local businesses and the loss of jobs.

It is not clear how relying on the 'grey belt' to re-provide industrial capacity lost on brownfield sites would work or prove a successful policy, especially given the relative value of industrial versus residential land and the need for industrial capacity to be woven into communities, for its full social and economic value to be realised.

### **Key recommendations:**

- The London Plan should include a strong presumption against further loss of industrial sites, unless a case can be made demonstrating a genuine long-term vacancy on specific sites.
- The London Plan should mandate boroughs to recognise and take account of industrial land and existing local economies. Before any area-wide plans are made, detailed audits of workplaces, workshops, studios and jobs should be carried out, mapping supply chains and business connections. These should be used to produce economic impact assessments for large developments.
- The London Plan Mayor should require that all existing economic activity is generously accommodated in new developments.
- The London Plan should protect shops, offices and industrial space wherever it is needed from permitted development.

#### **Further evidence**

Making Space: Accommodating London's industrial future. Centre for London, January 2023 <https://centreforlondon.org/wp-content/uploads/2022/01/CFL-IndustrialLand-v4-1.pdf>)

## **2.7 Wider urban and suburban London**

Housing development on existing well-connected land is welcome, and can make a significant contribution. It will be important to ensure that where new homes are rightly expected to have less provision for car parking due to other options, that high quality cycle parking must be provided, and support for access to local car and cycle hire.

Transforming car parks and retail parks into housing is a good step, and as we further explain in section 5 car parking should be kept minimal, considering the needs for accessibility, and ensuring alternatives to the private car are provided in full.

## **2.8 Other sources of housing supply**

The idea that we can address the housing crisis by building on the Green Belt is fanciful. London has twice the number of underoccupied homes compared to overcrowded homes. Our housing crisis has not been caused by a lack of space or overall supply, but the inequitable access to affordable, safe and secure housing (see the introduction to this section for further detail). Building on the Green Belt without addressing the drivers of our housing emergency will not help Londoners.

There is much more the Mayor and Government could do to improve affordability and quality across existing stock. We should be better regulating the costs of the private rented sector, including short term holiday lets; we should better regulate and combat second home ownership; and we should seriously invest in acquisition of underoccupied housing and convert it to social rent housing. Developing new housing on brownfield land, where 300,000 homes with permissions remain unbuilt. The Government should pull on a range of levers to better hold developers to account and fix our broken land market, while funding more social housing and kickstarting community-led housing development. The speculative private model of development is already failing to deliver for Londoners and will continue to do so on the green belt.

### **Key recommendations:**

- The new London Plan should require developers to apply lease conditions to the homes they build which make sure these are the primary residence of the new owners.
- The London Plan should prohibit 'Buy-to-Leave' for new builds, require developers to apply lease conditions to the homes they build which make sure these are the primary residence of the new owners.
- The London Plan should ensure new 'Buy to Let' homes are rented at a London Living Rent, by placing planning conditions on new private homes so that, if they are rented out privately, the rents charged are at or below the London Living Rent for that area.
- The London Plan should set out a clear set of conditions for when councils and the GLA will use CPO powers for empty homes in order to provide new social and living rent homes.
- The London Plan should set out how weight should be given to the social and community benefit of such homes when making decisions.

### **Further evidence**

The Invisible Land – the hidden force driving UK's unequal economy and broken housing market. IPPR, August 2018

<https://www.thinkhouse.org.uk/site/assets/files/1567/ippr0818.pdf>

CMA finds fundamental concerns in housing building market. Competition and Markets Authority, February 2024 <https://www.gov.uk/government/news/cma-finds-fundamental-concerns-in-housebuilding-market>

## 2.9 Beyond London's existing urban area

As it stands, the definition of 'grey belt' land is incredibly nebulous. Where the Green Belt provides a clear designation, 'grey belt' introduces its own grey area. As well as eroding the green belt, there are a number of risks associated with such a designation, in particular the risk of speculation on and inflation of prices of land that might be considered 'grey belt', and the incentivisation of land mismanagement by landowners so it deteriorates and may achieve 'grey belt' status.

## 2.11 Metropolitan Open Land

In too many cases, weak arguments for 'exceptional circumstances' are already being used to justify building on Metropolitan Open Land (MOL). This is often in disregard to the unique biodiversity value of these sites and does little – if anything – to improve the accessibility of MOL to the wider public. The application to expand the Wimbledon Tennis Championships on the Wimbledon Park Golf Course is one example (planning ref. 24/00987/FUL). In 2023, Former Assembly Member Siân Berry wrote a letter to the Mayor outlining the significant damage to the biodiversity of the site that would result from the development, and the 'pitiful' offer to the community for their use of the site under the proposals.

In Enfield, the council have recently approved a planning application for a new sports facility on Whitewebbs Park (planning ref. 21/P2900). While formerly a publicly owned golf course, for several years the site has been a publicly accessible park. My objection to this application illustrates the major threat to biodiversity proposed and the loss of publicly accessible land that such a development would entail. Instead, the development would enclose and privatise huge swathes of public land. While it is clear that London's abundant supply of golf courses could and should be used to create more publicly accessible open land, recent applications demonstrate that this has either not been achieved, in fact it's quite the opposite, in that it has severely threatened the existing biodiversity value of MOL. CPRE, a charity that advocates for the protection of green spaces, have highlighted the need for a sports development strategy for London to look at the use of space as increase leisure.

The London Plan must be more robust in obligations around biodiversity, particularly protecting existing biodiversity. Concerningly, the consultation document does not indicate an awareness of how biodiversity assessments have been skewed to facilitate new developments. Phrases like 'compensatory biodiversity uplift' suggest an absence of attempts to meaningfully map the unique biodiversity value of MOL sites.

The letter to the Mayor around Whitewebbs Park, highlighted how biodiversity destruction cannot simply be offset by 'more' biodiversity elsewhere, as existing sites of nature have a unique value that cannot simply be replaced or offset.

### **Key recommendations:**

- The London Plan should set out how Metropolitan Open Land will be better protected from development through more robust measures,
- The London Plan should strengthen existing regulations around biodiversity.

- 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, when it is decoupled from the protections of Green Belt.

### Further evidence

Request to refuse the application for Wimbledon Park Golf Course, London Assembly. Siân Berry, March 2024 <https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-members/publications-sian-berry/request-refuse-application-wimbledon-park-golf-course>

Request to call-in planning application for Whitewebbs Park, London Assembly. Zoë Garbett, April 2025 <https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-members/zoe-garbett/request-call-planning-application-whitewebbs-park>

Why London needs a Sports Development Strategy Now. CPRE, May 2025 <https://www.cprelondon.org.uk/news/sports-development-strategy-for-london/>

## 2.13 Planning for affordable housing

The London Plan should be more ambitious in its pursuit of social homes by demanding a higher percentage of affordable housing in development seeking planning permission. This would help quell the rapid land price inflation London has experienced particularly in the last two decades. Over time, slowing the inflation of reducing the value of land would make both home ownership and renting more affordable, and would reduce the costs of developing social housing.

There is debate over whether raising this threshold would diminish the overall number of affordable housing that could be delivered. But the speculative model of housing development leaves no guarantee that affordable homes will be delivered in a timely manner either way, as the Competition and Markets Authority found in 2024. IPPR estimate that 1.4 million homes with permissions had been left unbuilt nationally since 2007. There are currently 300,000 undeveloped permissions across London. This land banking is a visible phenomenon to Londoners throughout the capital, who see empty plots of land bought, usually sites are boarded up and stashed, then flipped for profit a few years later – with no construction on site.

Including higher proportions of social housing into land values would not necessarily slow development, but it would slow or reverse land-price inflation. This would be incredibly important in improving market affordability and unlock developments with a high proportion of social housing. Conversely, if higher levels of unaffordable market housing are permitted, through a lower threshold, land prices will rise. Extra supply may provide some



short-term relief to a saturated market, but in the long-term it will be detrimental to overall affordability and subsequent efforts to build more social housing. The London Plan must also guard against the loss of social housing in developments to 'viability testing', a process weighted against ill-equipped local planning departments.

Many boroughs currently start to require 'affordable' housing only for developments of 10 or more homes, which can incentivise artificially low numbers of homes on suitable sites. There should be no lower limit to contributions expected from developers to truly affordable housing. Preference for on-site provision should begin at a suitable level, but even small developments should be expected to make some financial contribution to this provision.

The London Plan should also properly prioritise social rent at the expense of other so-called 'affordable housing products'. Social rent is the only tenure we know to be genuinely affordable. The primary intermediate product endorsed in the London Plan, shared ownership, is rapidly losing its claims to affordability, through unpredictable and ever-inflating service charges. Demanding higher social rent delivery, will ease pressure on the private rented sector and help those with intermediate housing demand. An extensive evidence base has also demonstrated the significant economic value of building social rent homes over other tenures.

### **Key recommendations:**

- The London Plan should designate social rent as the sole 'affordable' housing tenure.
- The London Plan should set a 50 per cent target for affordable social homes in private developments, and a higher threshold for developments on public land, and raise thresholds correspondingly.
- The London Plan should mandate affordable social home delivery on all sites, regardless of size of overall development.
- The London Plan should de-prioritise – or buttress – viability tests, reducing the ability of developers to use viability tests to erode social housing commitments for individual developments.
- The London Plan should permit councils to set higher targets on affordable housing to respond to the overall housing need and manage specific land and housing pressures that occur locally.

## Further evidence

Building Hope: how land reforms will help deliver the homes we need, New Economics Foundation. Alex Diner and Michael Marshall, November 2024

<https://neweconomics.org/uploads/files/Building-Hope-web.pdf>

CMA finds fundamental concerns in housing building market. Competition and Markets Authority, February 2024 <https://www.gov.uk/government/news/cma-finds-fundamental-concerns-in-housebuilding-market>

Strategic Planning for Green Prosperity, Institute for Public Policy Research. Maya Singer Hobbs, February 2025 <https://www.ippr.org/articles/strategic-planning-for-green-prosperity>

Switching to social rent: delivering the homes we need, New Economics Foundation. Sam Tims, June 2024 <https://neweconomics.org/uploads/files/Switching-to-social-rent-delivering-the-homes-we-need-v2.pdf>

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>)

Building the homes we need, New Economics Foundation. Alex Diner, Sam Tims, and Dr Rhiannon Williams, October 2024 <https://neweconomics.org/uploads/files/Building-the-homes-we-need-web.pdf>

## 2.14 Estate regeneration

The changes proposed in the consultation document are undoubtedly necessary. But the next London Plan should go further to make sure estate regeneration actually works for estate residents and stops the loss of social housing resulting from regeneration.

Estate regeneration has historically resulted in the loss of social homes, both individual units and floorspace from London's housing stock. A 2015 report from the London Assembly Housing Committee estimated that the 50 estates in the capital 'regenerated' between 2004 and 2014 culminated in the net loss of around 8300 social rent homes. The Public Interest Law Centre published a report in 2024 called, *The promise of cross-subsidy: Why estate demolition cannot solve London's housing emergency*. This report details how estate regeneration has failed to deliver the housing London needs, as a result of overseeing the loss of social housing and the huge increases in costs for returning social tenants.

The 35% campaign was set up as result of the Heygate regeneration in Southwark, which saw estate regeneration cause the net loss of 1,100 social rent homes on that estate. There

are examples of this throughout London, which is why estate regeneration has frequently been described as ‘state-led gentrification’.

The previous London Plan took some steps in the right direction, but nowhere near enough to tackle the scale of the problem. Social homes are still being lost in great numbers from London’s regenerated estates. *The Alternative Good Practice Guide to Estate Regeneration*, authored by community-led organisations Just Space and the London Tenants Federation, provides a complete breakdown of the *Mayor’s Good Practice Guide to Estate Regeneration* and London Plan policies, and where they are falling short for Londoners. This report demonstrates a myriad of ways social homes are being lost within the current planning system.

The report mentions where residents do not take their right to return, and how social housing is routinely being downgraded to other ‘affordable’ tenures. A current example of this includes the planning application to redevelop the Lesnes Estate which was referred to the Mayor just this month. The application proposes to re-provide a maximum of 61 social homes for tenants taking up their right of return, from the 416 on the existing estate. Where social housing is being re-provided, they are often not protected as social rent homes in perpetuity. Many S106 agreements allow housing providers downgrade social homes to other ‘affordable’ tenures after the first let. Clearly, relying on the ‘right to return’ policy alone to protect much-needed social housing is inadequate.

But it is not the only way estate regeneration is compounding our shortage of social housing. The ‘temporary’ loss of social housing while regeneration projects are underway is also significant. Estate regeneration projects are incredibly complicated and uniquely exposed to changing market conditions and the shifting ‘viability’ claims of developers. There are no existing mechanisms to stop regeneration schemes rumbling on for years, or even decades.

The following are just three examples out of dozens of stalled regeneration programmes across London:

- **Carpenters Road estate, Newham, E7.** Plans for the demolition of the 700 homes have been in the works by Newham Council since 2000. Residents started being moved out of their homes in 2005. 20 years and several failed development partnerships later, redevelopment has not started.
- **High Lane estate, Ealing, W7.** In 2018, residents voted for regeneration, one of the first estates to do so after the Mayor introduced the ballot requirement. A planning application was not agreed for three years, in 2021. The council then started moving people out of the estate and by February 2022 over one-third of the homes were empty and boarded-up. In 2024, six years after the initial ballot, with 90 empty homes on the estate, the council’s development partner pulled out. At the time of writing, the council have still not secured a new development partner.
- **Avenue Road estate, Waltham Forest, E11.** In 2021, residents voted for regeneration in the ballot, under the impression they would have new homes to move into on the estate by 2026. However, in 2023, the private developer who had partnered with Waltham Forest Council on the scheme pulled out, saying it was no longer ‘financially viable’ to continue. At the time of writing, the Council does not have a development partner. They have said they hope building will *start* in 2026.

There are thousands of social housing tenants who have been displaced while they wait for a seemingly interminable estate regeneration project to conclude. In the meantime, councils and housing associations relocate them to other homes, thereby depriving families on waiting lists of their own home. Thousands of social homes are left empty on estates, for years and even decades at a time, as regeneration projects stall. If they are not displaced, residents are forced to live through managed decline on the estate – as looming regeneration plans disincentivise councils and housing associations from investment and upkeep.

This situation is worsened by the current London Plan, which does not provide the right incentives for developers to accelerate regeneration schemes. The longer the scheme is drawn out, the less likely social residents will take up their right to return, and the more profitable the scheme will be for the developer. Meanwhile, communities are permanently broken up and vital social housing lost, or else destined to live through ever-deteriorating conditions.

### **Key recommendations:**

- The London Plan should continue to allow residents to exercise their right to return, while ensuring all social housing floorspace on the existing estate is re-provided.
- The London Plan should *at least* make a presumption against demolition and redevelopment where phased redevelopment and a substantial uplift in social housing is not possible.

## Further evidence

Knock it Down or Do it Up? London Assembly Housing Committee, February 2015  
[https://www.london.gov.uk/sites/default/files/gla\\_migrate\\_files\\_destination/KnockItDownOrDoltUp\\_0.pdf](https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/KnockItDownOrDoltUp_0.pdf)

The promise of cross-subsidy: Why estate demolition cannot solve London's housing emergency. Dr Joe Penny, August 2024  
[https://www.pilc.org.uk/wp-content/uploads/2024/09/The-promise-of-cross-subsidy\\_FULL-REPORT.pdf](https://www.pilc.org.uk/wp-content/uploads/2024/09/The-promise-of-cross-subsidy_FULL-REPORT.pdf)

Heygate Estate, 35% Campaign. Accessed, June 2025  
<https://www.35percent.org/estates/heygate/>

Housing stock transfers, regeneration and state-led gentrification in London. Urban Policy and Research. Paull Watt, September 2009  
<https://www.tandfonline.com/doi/full/10.1080/08111140903154147>

The Alternative Good Practice Guide to Estate Regeneration. Estate Watch, January 2023 <https://estatewatch.london/images/mertons106.pdf>

Residents 'left to rot' next to boarded-up houses as Clockwork Orange estate regeneration stalled, London Evening Standard. Jabob Philips, January 2025  
<https://www.standard.co.uk/news/london/lesnes-estate-residents-regeneration-stalled-b1205482.html>

## 2.15 Build to Rent

The growth of the Build to Rent sector is a symptom of our housing crisis, not a solution to it. Fewer of London's renters are moving into homeownership, and they are expecting to pay higher rents, and for longer, to remain in London. As illustrated in Figure 2.5 on page 33 of the consultation document, Build to Rent developers are buying up an increasing amount of large scale new-build developments. Build to Rent developments may provide short term relief to an overheated private rented sector, particularly by drawing higher-income young professionals, out of existing rental stock. But without new policies these high-end developments often backed by institutional investors will continue to drive the long-term inflation of land values, causing displacement and perpetuating the cycles of unaffordability they are intended to address. More renters will be locked out of home ownership in the long-run, meaning any short-term relief to affordability will likely be negated in the medium to long term, as renters remain in the private rented sector.

As a long-term strategic framework, the London Plan has a duty to account for the long-term implications of leaning too heavily on this kind of development, especially where it does not provide much-needed social housing.

### **Key recommendations:**

- The London Plan should no longer allow Build to Rent providers to Discounted Market Rents above London Living Rent levels and should demand the same quota of social rent as other developments.

#### **Further evidence**

Open for Business or Up for Sale? Institutional Investors in UK Real Estate Market, Common Wealth. Adam Almeida, February 2025 [https://cdn.prod.website-files.com/62306a0b42f386df612fe5b9/67ae1254b4f4ffe6e38a3b0f\\_Open%20for%20Business%20or%20Up%20for%20Sale%20final%20draft.pdf](https://cdn.prod.website-files.com/62306a0b42f386df612fe5b9/67ae1254b4f4ffe6e38a3b0f_Open%20for%20Business%20or%20Up%20for%20Sale%20final%20draft.pdf)

## **2.16 Other housing options**

Please see 2.17 and 2.18.

## **2.17 Specialist and supported housing and housing London's older population**

Specialist and supported housing can be important in meeting certain people's housing needs. While we strongly support the need for high-quality supported housing for those who need it, it is essential not to conflate this with general needs accessible housing. Too often, the shortage of accessible social rent homes means Disabled people who do not require support are allocated to supported housing settings simply because there are no appropriate alternatives. This undermines choice, independence and the right to live in the community. To avoid this, the priority of the next London Plan should be increasing the supply of general needs, accessible social rent housing alongside any strategy for supported housing. Both are urgently needed, but they serve distinct purposes and must be planned for accordingly.

### **Key recommendations:**

- Inclusion London, pan-London disability equality organisation, have made a consultation submission and we support their recommendations.
- The London Plan should ensure specialist and supported housing accompanies, rather than supplants, delivery of accessible general needs housing (as described in 2.13).



## 2.18 Purpose built student accommodation and other forms of shared housing

Purpose built student accommodation (PBSA) only addresses a very narrow housing need. Unlike other types of specialist or supported housing, this need can often be met through other housing products. This is chiefly because it is unaffordable to many students, and therefore excludes students with the most pressing housing need. It is also a deeply inflexible housing product, otherwise only able to be repurposed for high-end 'co-living' rentals.

As well as its limited capacity to meet housing need, as the consultation document notes, developing PBSA risks draining development capacity away from general needs and family housing in a given area. Given its profitability for developers, it can also contribute to increasing land values. In some boroughs, like Southwark and Brent, student housing takes up a significant portion of proposed development. This is a major concern in a city chronically short of affordable, accessible family-sized housing. As well as being vital to house families, family-size housing is also far more versatile than PBSA and can be repurposed easily to support students or other individual sharers depending on demand.

The consultation document notes that the quality of houses of multiple occupation (HMOs) 'can be a concern'. The poor quality of HMOs should not justify building more PBSA, it is something that should be addressed outside of planning through better regulation of the private rented sector and improved rights for renters. Renters should be empowered to ask landlords to make accessibility adjustments and held to account through better licensing and enforcement processes by councils. If an HMO is too poor quality for students, it is also likely to be unsuitable for families. Again, PBSA will not necessarily meet the housing needs of students more effectively than building more affordable, accessible family-sized homes.

### **Key recommendations:**

- The London Plan should set London-wide caps limiting the volume of student housing that can be built, and boroughs should be allowed to set their own caps.
- The London Plan should consider revising the definition of affordable student accommodation, based on an evaluation of genuine affordability.

#### **Further evidence**

Live planning applications proposing PBSA. London datastore, accessed June 2025  
<https://data.london.gov.uk/dataset/pld-live-pbsa-units/>

## 2.19 Gypsy, Roma, Traveller and Travelling Showpeople

The action taken forward to improve the living conditions of Gypsy, Roma, Traveller and Travelling Showpeople since the last London Plan has been extremely poor. As of December 2024, the campaigning group London Gypsies and Travellers were not aware of any councils who had completed and shared health and safety audit reports of existing traveller sites in their boroughs – despite this being a condition of Policy H12 of the existing London Plan. The lack of reporting and monitoring of this policy has allowed boroughs to dodge scrutiny.

This new London Plan should do far more to ensure that these groups have sufficient safe and suitable accommodation, being cognisant that distinct groups in this broad category have different needs (e.g. Ethnic Roma are more likely to require support for accessing and sustaining bricks-and-mortar accommodation, not site-based provision). The London Plan must also demand higher standards of engagement and co-production with relevant communities, including a revision of the Gypsy, Roma and Traveller Accommodation Needs Assessment (GRTANA) – whose methodologies and initial findings have been questioned extensively by communities.

### **Key recommendations:**

- The next London Plan should ensure the evidence base used to set targets takes account of extensive criticism from affected groups of the consultation process and methodology behind the GRTANA.
- The next London Plan should set targets for permanent pitches and plots.
- The next London Plan should require boroughs to consider granting permanent permission for suitable sites which currently have temporary planning permission.
- The next London Plan should include a London-wide target for transit pitches and provision for negotiated stopping arrangements.

#### **Further evidence**

Roma housing in London: barriers and inequalities, Roma Support Group. Ted Sale, February 2025

[https://www.romasupportgroup.org.uk/uploads/9/3/6/8/93687016/rsg\\_housing\\_london\\_hq.pdf](https://www.romasupportgroup.org.uk/uploads/9/3/6/8/93687016/rsg_housing_london_hq.pdf)

## **3. Growing London's economy**

The major challenge facing London's economy is not driving growth, but ensuring it is equitable and sustainable. More people must benefit from the wealth created in our city, existing value must be protected, and we must develop a more resilient city in the face of climate breakdown. Inclusive economic development is a core value of 'Good Growth', albeit one lacking clear definition and weight in the last London Plan. Yet, the new London Plan risks falling victim to the growth-at-all-costs mentality of the London Growth Plan published earlier this year – a document barely informed by public consultation and facing little to no scrutiny in its development.

The London Plan must acknowledge that London's economy is far more than numerical measures of economic activity and far more than its 'growth sectors'. London's economy is the small and independent businesses that supply much-needed affordable produce to communities increasingly beset with poverty; the high streets, town centres and markets that provide vital social infrastructure, shared identity and culture; the last-remaining small studios and workspaces that make London tick and provide essential local employment; the grassroots venues that are the seeds of the UK's booming arts sector.

This real-life economy of traders, creators, makers and workers, embedded in our communities, is absolutely integral for a resilient and varied economy, and ensuring London remains rich with culture and diversity. But this real-life economy is draining out of London, with these low-cost spaces unable to compete with high-end housing, or expensive 'workspaces' for remote workers. For too long, these real-life economies have culturally enriched areas, but never gained from the uplift in land values they have made possible, then suffered from displacement and loss.

The London Plan must take a holistic view of London's economy, looking outside the narrow and reductive lens of economic growth. Without inclusive economic development, inequality and poverty will rise even as the economy grows, and London will be robbed of the parts of its economy that make it liveable, resilient and special.

### **3.1 The Central Activities Zone**

The London Plan must retain and expand the Central Activities Zone's (CAZ) functions outside of it being an engine for growth. As well as demand for high-end office space, there is also significant demand for lower specification, more affordable workspace that could be used for a range of hugely valuable functions – like charities and NGOs, gallery spaces and art studios, and community hubs for local residents and people from across London.

The CAZ should expand and diversify its offer as a cultural destination for Londoners, as well as tourists. In response to the Oxford Street Mayoral Development Corporation (MDC), Caroline Russell AM recently responded to TfL's consultation on Oxford Street Transformation, supporting plans for pedestrianisation of Oxford Street and more open spaces freely accessible to all, with plenty of trees, benches, and free-to-use public toilets. Responding to the consultation Caroline said:

"If the MDC can provide an inclusive structure to support creative activity and independent retail and food outlets, then there is scope for Oxford Street to become more than a shopping street, it could become an attractive destination where people enjoy visiting and spending time."

In the consultation response, Caroline raised the importance of the power to grant discretionary relief from non-domestic rates to support small, independent food and retail businesses and emerging creative industries to have a foothold on Oxford Street, adding to the diversity of the offer to visitors. She also says that the MDC must "ensure that enjoyment of Oxford Street as a public space is not dependent on people being able to spend money in expensive cafés and restaurants."

Although the ‘Agent of Change’ principle in the 2021 London Plan was welcome, the 2025 report by the London Assembly Economy, Culture and Skills Committee, *London’s Night-Time Economy*, found that the current principle ‘lacks teeth’ because it is guidance, rather than a legal stipulation. Experts providing evidence adding that there is a lack of understanding of how the principle is applied on a practical level. The Committee recommended that the Mayor lobby the Government to put the Agent of Change principle on a statutory footing and encourage the GLA to support boroughs in incorporating their night-time strategies.

CAZ must also provide a diverse mix of spaces to support itself sustainably; the threat to central London wholesale markets Smithfield and Billingsgate – who supply a huge chunk of London’s meat and fish for hospitality – is an illustration of how London needs the London Plan must better protect diverse uses of space and historic, culturally significant markets. More evidence on markets is provided in 3.3.

### **Key recommendations:**

- The London Plan should strengthen ‘agent of change’ protections for areas and venues with night-time cultural uses and implore boroughs to take advantage of these policies.

#### **Further evidence**

London’s Dead Spaces: bringing them back to life. Siân Berry, June 2022

[https://www.london.gov.uk/sites/default/files/2022\\_06\\_dead\\_spaces\\_sian\\_berry\\_am\\_f inal.pdf](https://www.london.gov.uk/sites/default/files/2022_06_dead_spaces_sian_berry_am_f inal.pdf)

At a crossroads: London’s high streets. 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>

Response to the TfL consultation on Oxford Street transformation. Caroline Russell, April 2025 [Response to TfL consultation on Oxford Street Transformation | London City Hall](#)

London’s Night-Time Economy. Economy, Culture and Skills Committee, February 2025

<https://www.london.gov.uk/sites/default/files/2025-02/Economy%20Culture%20and%20Skills%20Committee%20-%20London%27s%20Night-Time%20Economy%20-%20FINAL%20%28002%29.pdf>

## **3.3 Town centres and high streets**

Street markets and independent shops in our town centres and on our high streets are the beating heart of our diverse city. They are vital sources of community, culture and identity,

and their affordable and diverse produce is a lifeline for many Londoners. Their value extends far beyond measures of economic activity, but is inadequately recognised in planning.

In recent years, a significant amount of research has been underway to map and identify the unique value of these markets, like Queen's Market in Newham. The social importance of markets was captured in the London Assembly Planning and Regeneration Committee's recent report, which set out a number of recommendations about how the London Plan can take a wider view of businesses with a distinct social value, including street markets. It has been demonstrated across London that development can cause significant damage to local culture and heritage if these community assets are not properly recognised or protected in planning, like the redevelopment of Elephant and Castle (see 2.5 for more detail).

The London Plan must do more to protect these markets and business clusters – which may be described as 'emerging heritage'. Some boroughs are already seeking to protect distinctive localities or clusters of businesses, such as markets, within their areas. Many of these clusters are not only important to their local communities but also have significance across London. Examples of culturally important areas such as Chinatown, Brixton, Elephant and Castle, Seven Sisters, Denmark Street and Brick Lane, each associated with particular ethnic or cultural communities. These areas of 'emerging heritage' form a key part of London's character as a diverse, culturally-rich global city, but are rarely old enough for official heritage protection, especially as their traditions often depend more on custom and usage than physical features.

Communities should also be given better ways to take over and repurpose underused commercial units for public good. The need to inject our high streets with new, community-led initiatives has recently been echoed cross-party, through the April 2025 report, *At a crossroads: London's high streets*, by the Economy, Culture and Skills Committee. Work by former London Assembly Member Siân Berry has shown the scale of 'dead spaces' in London – former commercial units that have been allowed to remain vacant – and the ways they can effectively repurposed.

Nonetheless, the introduction of use class E risks taking flexibility for use classes too far. It risks depriving local authorities of strategic oversight of their town centres, which is needed more than ever to shape the sustainable and equitable development of London, as spaces can be repurposed without permission across such a breadth of different uses. In turn, this risks preventing community-led initiatives from being able to use sites given the intensified competition for space.

The London Plan must also account for sustainable transport to ensure the sustainable development of our high streets. The Economy Committee report, *Winning the Race to Net Zero for London's Businesses*, published in April 2023, discussed the need to incentivise more businesses to take up cargo bikes as a last mile delivery option. But for this to be a viable option for business and for them to help us reach our goals of reducing emissions and decarbonising, there needs to be spaces such as hubs to allow for the consolidation of deliveries from multiple businesses in a particular area. This would reduce the number of individual deliveries and improve delivery efficiency. These hubs can also provide secure locations or cargo bike parking reducing the risk of theft to the bikes. The Committee said it

believed that the Mayor and TfL can go further to support the growth of cargo bikes in London and adapting to sustainable last mile logistics is one element of allowing this to happen.

**Key recommendations:**

- The London Plan should allow communities to create new designations for culturally significant areas and clusters following community-led audits. This could be based on the notion of 'emerging heritage'.
- The London Plan should mandate the reprovizion of premises, both informal (like street vendors) and formal, lost as a result of development, on stable rents.
- The London Plan should better protect existing low-cost workspace, like offices, council depots and railway arches, especially those publicly owned. These spaces can be repurposed with social leases.
- The London Plan should make provisions for using empty properties for the benefit of local charities, social enterprises and community groups, and should monitor closely how the introduction of use class E risks depriving communities of much-needed spaces, through extremely flexible use.
- The London Plan should ensure space is preserved for last-mile logistic hubs to service key areas of economic activity, both established, new and those in redevelopment.



### Further evidence:

Social value in planning and regeneration. London Assembly Planning and Regeneration Committee, April 2025

<https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-press-releases/give-londoners-power-protect-markets-community-assets>

At a crossroads: London's high streets. London Assembly Economy, Culture and Skills Committee, April 2025

<https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-work/london-assembly-publications/put-local-communities-heart-high-street-regeneration>

Winning the Race to Net Zero for London's Businesses. London Assembly Economy Committee, April 2023

<https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-work/london-assembly-publications/winning-race-net-zero-londons-businesses-report>

London's Dead Spaces: bringing them back to life. Siân Berry, June 2022

<https://www.london.gov.uk/who-we-are/what-london-assembly-does/assembly-members/publications-sian-berry/publication-sian-berry-londons-dead-spaces>

Developing markets as community hubs for inclusive economies: a best practice handbook for market operators, Markets 4 People. Myfanwy Taylor, Sara González, Paul Waley and Rosie Wilkinson, 2022

[https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2022/04/220408-HB1-final-version\\_RW\\_ONLINE.pdf](https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2022/04/220408-HB1-final-version_RW_ONLINE.pdf)

Social value in planning and regeneration: Knowing the price of everything and the value of nothing. London Assembly Planning and Regeneration Committee, April 2025

<https://www.london.gov.uk/sites/default/files/2025-04/Social%20value%20in%20planning%20and%20regeneration%20report%20April%202025.pdf>

Queen's Market: a successful and specialised market serving diverse communities in Newham and beyond, Markets 4 People. Drs Myfanwy Taylor, Sophie Watson, Sara González, Lisa Buckner, Andy Newing and Rosie Wilkinson

<https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2021/06/210531-M4P-Queens-FINAL.pdf> Drs Myfanwy Taylor, Sophie Watson, Sara González, Lisa Buckner, Andy Newing and Rosie Wilkinson

<https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2021/06/210531-M4P-Queens-FINAL.pdf> Drs Myfanwy Taylor, Sophie Watson, Sara González, Lisa Buckner, Andy Newing and Rosie Wilkinson

<https://trmcommunityvalue.leeds.ac.uk/wp-content/uploads/sites/36/2021/06/210531-M4P-Queens-FINAL.pdf>

### 3.4 Industrial land

See 2.6.

### 3.7 Visitor economy

See 2.8.

### 3.10 Affordable workspace

Policy-created affordable workspace in new developments is a sticking plaster over wider issues of unaffordability and ownership – where the public, through the state or community groups and cooperatives, has control over spaces and can shape them in local interests, rather than in the interests of profit. The London Plan must prioritise providing communities with ownership over and access to affordable spaces as far as possible, for instance through policies proposed in my response to 3.3.

There are a number of issues with how ‘affordable workspace’ – as it is referred to in 3.10 – is measured. The 50,000 square metres figure cited in the consultation does not account for the amount of genuinely affordable workspace that was lost through redevelopment, including the loss of spaces in ‘meanwhile use’. It is imperative that new developments at minimum replace affordable space, whether or not it is officially designated ‘affordable workspace’ – including parcels of land used for informal work, like street vending. Providing a permanent uplift of affordable workspace is particularly essential as new, market-led housing developments can lead to cycles of gentrification and displacement, especially when existing businesses are forced out and replaced with businesses catering to higher income customers (see 2.5).

‘Office’ uses for affordable workspace are far less of a priority than providing genuine community spaces, including community oriented cultural and hospitality venues and studio space for artists and makers, so ‘office’ use should be deprioritised. Communities should have a hand determining the use of affordable workspace.

#### **Key recommendations:**

- The London Plan should insist on a significant uplift of ‘affordable workspace’ around new developments, secured in perpetuity. This should account for sites not specifically designated ‘affordable workspace’ that are now providing low-rent workspace.
- The London Plan should no longer prioritise office space for affordable workspace provision. Use should be determined in consultation with the local community.

## 4. London's capacity for growth and design quality

London's built environment will change drastically in the coming decades. It is not the time to shed standards in pursuit of development at all costs – which we know will not fix our housing crisis or make London a more liveable city. We must expect and demand more, and ensure Londoners have a hand in shaping the future of their city at every stage.

The next London Plan should continue insisting on high standards for new developments and expand its strategic role in managing London's land in the interests of the public. Crucially, it must take the task of engaging with communities and protecting London's rich culture and marginalised groups from the adverse impacts of development far more seriously.

### 4.2 Tall buildings

The rise and rise of tall buildings since the turn of the millennium has coincided with rocketing land prices in London. Land values are responding to developers' potential to build high, and sell more units. Land price inflation has resulted in a scenario where it is far harder to build mid-rise blocks, as they are not considered as 'viable'. Mid-rise buildings can achieve similar densities with a more communal form and amenity space, and a far smaller carbon output. The tendency to build tall, along with rising land values, is increasingly freezing SMEs out of the development market.

The solution is not to continue down the current path, but to use the London Plan to take a more active role in managing the development of tall buildings across London. This includes imposing more restrictions on the location and density of clusters of tall buildings across London. The result could be more liveable developments and neighbourhoods, while dampening down speculation and land values.

To inform this policy development, the new Plan should refer to the 2024-25 London Assembly Planning Committee's investigation into Tall Buildings. There is still lots of work to be done to identify the following:

- the desirability of living in tall buildings across demographics, and therefore their contribution to meeting housing needs;
- the impact on land values of tall building development over the past two decades;
- the environmental impacts of tall buildings.

### **Key recommendations**

- The London Plan should take a more active role in identifying where tall buildings should be built, according to its current definition of a tall building. This should be based on an analysis on the real-world implications of building tall, including the impact on land values and the disproportionate climate impacts of tall buildings.
- The London Plan should not change its designation of what constitutes a tall building

- More weight should be given to the impact of tall buildings on the surround areas, especially in regards to increased pollution, decreased light for existing dwellings, stress on local services and loss of outdoor community space.

#### **Further evidence**

Just Space 2024 Manifesto – A different kind of London. Just Space, April 2024  
<https://justspace.org.uk/wp-content/uploads/2024/04/just-space-2024-manifesto-final.pdf>

Do tall buildings work in London? London Assembly Planning and Regeneration Committee, April 2025 <https://www.london.gov.uk/sites/default/files/2025-05/Do%20tall%20buildings%20work%20in%20London.pdf>

### **4.3: Supporting a denser London linked to transport connectivity**

See 5.12.

In 2024 Transport for All (TfA) published their Accessibility Review of the PTAL Index. The evidence in this report suggests that the current Public Transport Accessibility Level (PTAL) index actively excludes disabled people from London’s planning system.

The current London Plan mentions that: “TfL is developing a new connectivity metric to complement PTAL that is based on journey times by sustainable modes to useful destinations.”

We support the premise of a new connectivity metric, and we ask that the new London Plan takes into account the Accessible Public Transport Accessibility Level – or APTALs – proposed by TfA, which they have submitted for consideration for inclusion in the new London Plan.

We further support the submission by Inclusion London to the new London Plan, in which they said they are: "concerned that no consideration has been given to the proposal of revising the existing PTAL to ensure it includes basic accessibility metrics. The current index does not enable good planning and provision of truly accessible public transport connections. It also fails to provide a comprehensive picture of existing accessible transport infrastructure that is needed to inform the London Plan’s approach to accessible housing development.”

#### **Key recommendations**

- The Plan should reference the recommendations set by TfA, that the PTAL index should be revised to include:
  - Step-free access as a core metric

- Accessible toilet provision
- Overcrowding levels
- Real journey times for Disabled people
- The Plan should include recommendations set by Inclusion London:
  - Require boroughs to allocate accessible housing – particularly M4(3) homes – near genuinely accessible public transport, including step-free stations and frequent, accessible bus routes.
  - Embed lived experience, including that of Disabled people, into transport and housing planning by requiring Boroughs to set up well-resourced access panels and establish co-production processes with Disabled residents.

#### **Further evidence**

Accessibility review of the PTAL index. Transport for All, January 2024

<https://www.transportforall.org.uk/wp-content/uploads/2024/11/Public-transport-accessibility-level-review.pdf>

## **4.4 London's heritage**

A letter from the Housing Committee to the Mayor on retrofitting London's housing stock in October 2021 identified the barriers around retrofitting in conservation areas and on listed buildings, which the London Plan could remedy. The need for installing clean sources of energy on listed buildings was echoed in a motion of the London Assembly, passed in 2023.

The London Plan should also follow the lead of the Historic England Advice Note (HEAN) 2024, which aimed to simplify the planning process for people making improvements to listed buildings to reduce their carbon emissions. London has over 1000 conservation areas, the London Plan should explicitly support the reasonable introduction of solar panels, among other carbon reduction measures, for buildings and homes in these areas.

### **Key recommendations:**

- The London Plan should highlight the importance of these buildings in meeting net zero and develop a new policy supporting the adaptation and retrofit of historic buildings and dwellings in conservation areas.

### Further evidence

Letter from Housing Committee on retrofitting London's housing stock. Sian Berry, 6 October 2021

<https://meetings.london.gov.uk/documents/s93831/Letter%20to%20Mayor%20-%20retrofit.pdf>

London Assembly calls for boroughs to install solar panels on listed buildings, June 2023

<https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-press-releases/assembly-calls-boroughs-install-solar-panels-listed-buildings>

New Advice on Adapting Historic Buildings for Energy and Carbon Efficiency. Historic England, July 2024 <https://historicengland.org.uk/whats-new/news/new-advice-on-adapting-historic-buildings-for-energy-and-carbon-efficiency/>

## 4.6 Heat risk, ventilation and overheating

As climate crisis worsens, the health risks associated with overheating will only intensify. In 2022, almost 3000 people died due to 'excess heat'.

The London Plan currently demands high standards to mitigate heat risk; these standards should be retained. The most effective ways of reducing overheating risk in a home is through 'passive cooling' methods, like dual-aspect, limiting glazing, wide-opening windows and external shading. Passive cooling can preclude the need for costly and energy-intensive alternatives, like air conditioning, which will worsen London's wider heat island effect and fuel health inequalities.

### **Key recommendations:**

- The London Plan should continue to prioritise passive design and ventilation measures.

## 4.8 Accessible housing

Disabled people face unique barriers to accessing safe, secure and affordable housing. Inclusion London's incredibly comprehensive recent report identified a range of major issues about how the planning and development system is failing to address disabled people's housing need. This includes:

A chronic absence of accessible social rent homes, particularly fully adapted wheelchair user homes. While demand for accessible housing across all tenures is high, the greatest unmet demand for wheelchair accessible homes remains in the social rented sector.



The London Plan currently does not distinguish between M4(3)(a) wheelchair adaptable and M4(3)(b) wheelchair accessible standards in its targets for new build properties. There is a huge difference between wheelchair adaptable and wheelchair accessible – because of the shortage of expertise and understanding, it’s often a very long and difficult process to get homes adapted.

The current 10 per cent target for wheelchair user homes does not guarantee an equal distribution of wheelchair user homes across affordability categories. This can be exploited by developers, who provide accessible homes in market tenures.

There is a lack of definition of what constitutes an accessible homes, and the range of adaptations required to meet different people’s needs.

There are also issues with reporting. While the London Plan Annual Monitoring Report accurately captures data on types of affordable homes that are being built in London, it does not track how many of these affordable homes are accessible. This means it is not possible to assess if and how many affordable homes by type are built to M4(2) accessible and adaptable, M4(3)a wheelchair adaptable and M4(3)b wheelchair accessible standards. Similarly, while the AMR monitors data on accessible housing starts and completions by M4(2) accessible and adaptable and M4(3) wheelchair user homes standards, this data is not broken down by tenure.

More broadly, the current London Plan fails to integrate the need for accessible housing with the need for genuinely affordable (i.e. social rent) housing and respond to the acute need of disabled people for affordable homes – and the disproportionate health impacts that may arise from inappropriate, unaffordable or insecure housing. We support Inclusion London’s response to the consultation.

### **Key recommendations:**

- The next London Plan should ensure accessible housing is marketed to Disabled people first.
- The next London Plan should require M4(3)(b) wheelchair accessible standards for homes in different tenures.
- The next London Plan should set distinct targets for M4(3)(a) and M4(3)(b) wheelchair accessible homes, including a minimum target for wheelchair user social rent homes.
- The next London Plan should include “the supply of affordable and accessible homes” be added as a Key Performance Indicator (KPI).

### **Further evidence**

Barriers at Home, Inclusion London. Laura Vicinanza and Mariella Hill, February 2025  
<https://www.inclusionlondon.org.uk/wp-content/uploads/2025/02/Barriers-at-Home-report.pdf>

## 4.10 Designing for everyone

### Consultation and engagement

Engagement and meaningful co-production must become a bigger part of the planning process if the new London Plan is to shape inclusive development in line with Good Growth principles.

Despite these principles apparently being at the heart of the current London Plan, it is deeply lacking in policies that are measurable, enforceable and meaningful. Community groups on the London Housing Panel, for instance, concluded that planning in London is still incredibly opaque and exclusionary. For instance, while Policy D5 in the current London Plan encourages engagement with Disabled people and disability groups from the outset, Inclusion London (a pan-London organisation that represents Deaf and Disabled people's groups across London) has reported that Deaf and Disabled Groups are rarely consulted at design stages. This indicates an absence of robust measures to monitor consultation, engagement and involvement of communities. Best practice examples from around London, like the London Borough of Hammersmith and Fulham's Inclusive Design Review Panel, should be considered for the next London Plan.

The current planning system's approach to assessing the equalities impacts of development is also deeply lacking. This is illustrated in estate regeneration schemes around London – which often result in the displacement of low-income and ethnic minority groups. Around London, campaign groups have been set up specifically to combat this phenomenon, like Latin Elephant based around Elephant and Castle. Tower Hamlets have made steps towards incorporating the Public Sector Equality Duty (PSED) into planning, in response to concerns about the impact of development on marginalised communities. In Louisville, Kentucky, the city council is introducing a new tool to measure the displacement and gentrification risk of new housing developments. The next London Plan must more substantially engage with the equalities impacts of development, acknowledging the huge array of downsides of development that may worsen existing inequalities and undermine the very character of our city.

It is imperative that the next London Plan sees co-production and equalities not as a burden on development, but rather an integral component of creating strong, cohesive and functioning communities that genuinely work for all Londoners, and do not exacerbate existing inequalities. Just Space, a grassroots planning network representing dozens of local groups around London, have set out a range of issues that should be addressed in the London Plan in their 2024 Manifesto, which should be considered in depth.

### **Key recommendations:**

- The London Plan should consider how it can better track and mitigate the equalities impacts of developments, ensuring the PSED and principles behind it become a central feature in planning.

- The London Plan should require large planning applications to demonstrate how they have been meaningfully informed by a range of lived experience – through design panels as well as broader programmes of consultation and engagement. Engagement should be better monitored and assessed.

#### Further evidence

Loretta Lees helps develop new tool to fight gentrification in Louisville, Kentucky. Matthew Dineen, November 2024 <https://www.bu.edu/sociology/2024/11/22/loretta-lees-helps-develop-new-tool-to-fight-gentrification-in-louisville-kentucky/>

London Housing Panel Community Conversations: Findings Report. Trust for London, June 2024 [https://tfl.ams3.cdn.digitaloceanspaces.com/media/documents/London\\_Housing\\_Panel\\_Community\\_Conversations\\_Findings\\_Report\\_FINAL.pdf](https://tfl.ams3.cdn.digitaloceanspaces.com/media/documents/London_Housing_Panel_Community_Conversations_Findings_Report_FINAL.pdf)

Supporting migrant and ethnic economies through regeneration in London. Latin Elephant, 2021 [Supporting-migrant-and-ethnic-economies-throughout-regeneration-in-London.pdf](#)

Case study: Assessing the equalities impacts of development to protect cultural and community spaces. London Assembly <https://www.london.gov.uk/programmes-strategies/arts-and-culture/space-culture/cultural-infrastructure-plan-and-toolbox/support-culture-and-community-spaces-risk/case-study-assessing-equalities-impacts-development-protect-cultural-and-community-spaces>

Just Space 2024 Manifesto – A different kind of London for people and communities. <https://justspace.org.uk/wp-content/uploads/2024/04/just-space-2024-manifesto-final.pdf>

## 5. London's infrastructure, climate change and resilience

The new London Plan must be considered against the context of London's progress on key environment and transport goals. London is currently in excess of the level of aviation and car traffic envisaged in the Mayor's 2030 net-zero pathway. There are serious choices to be made about where residual emissions will come from and what they are used for – we need to reduce demand for energy, reduce emissions and improve people's lives like retrofitting to relieve Londoners from cold, damp and mouldy homes.

For transport matters specifically, the targets in the Mayor's Transport Strategy need redoubled efforts. Major investments like the Bakerloo line extension are now unlikely in the immediate future, and the last major piece of infrastructure delivered was the Silvertown Road Tunnel.

TfL has now operated for a number of years planning between both the targets in 2041 for the Mayor's Transport Strategy and having an eye on the Mayor's net-zero pathway to 2030. Despite this, road traffic has increased in every year after the pandemic, and short-term gains on making healthy streets a reality in some parts of London have not now cohered into a sustained, London-wide plan.

### **Improvements to the London Plan evidence base and support for other Mayoral commitments**

The evidence base for the new London Plan does not currently include the food strategy, adopted in 2018, this should be rectified.

The Mayor's Environment Strategy has no current implementation plan, and no alternative has been published in relation to the evolving missions and mandates approach adopted by the Mayor. The current statutory strategies need to be given significant weight within the London Plan, but it is important to note the need to update them, at the very least by reflecting current delivery or implementation plans.

In addition, the evidence base refers to a number of future publications for which the Mayor has not share in advance. This includes the *Road Map to Achieving the World Health Organisation's 2021 Air Quality Guidelines in London and Net Zero policy approach*, which is due this summer.

Without an underpinning of specific environmental targets, the Plan cannot adequately respond to the evolving and urgent climate crisis. In the absence of clear policy goals, I can only refer to the wider environmental context in London.

However, the inclusion of the Mayor's Pathways to Net Zero Carbon and the London Climate Resilience Review in the evidence base is welcome. The Mayor and his planning team are encouraged to ensure these documents, in particular are given as much weight as possible in the London Plan to prioritise tackling the climate crisis.

Although, there is concern that this section does not clearly mention contaminated land, and that pollution is still referred to as something found only in specific places like air and water. A more holistic view of chemical and other contamination, and the routes by which it interacts with biodiversity and people in London, would be welcome. This is particularly important as awareness grows about the risks of 'forever chemicals' in the environment.

As the Government is also still considering changes to biodiversity checks and other safeguards in the NPPF, there are concerns about delays incorporating these into the London Plan.

The London Assembly Environment Committee did strong work on light pollution in the previous term, calling on the Mayor to create a light pollution strategy – the London Plan should also reflect on the need for better evidence for and regulation of the harms Londoners can suffer from such pollution such as disturbance to sleep and their own enjoyment of the city. The plan should ensure that Londoners need for dark in the city, along with that of wildlife is given protection against developments that create new bright sources of light – such as lighting and advertising.

Regarding the approach to delivering net zero – the London Assembly Environment Committee have made clear recommendations on how to engage with Londoners.

In addition, there is a need to ensure all parts of the current aviation policy remain in place in the new London Plan to avoid London's carbon emissions being driven by ever increasing aviation, at a time when decarbonisation is urgent. There should be no increase in aviation capacity in London, alternatives need to be provided to aviation for shorter journeys and smaller airports like City Airport can be put to more productive use for the land with less impact on Londoners.

### **Key recommendations:**

- The Plan must incorporate the adopted London Food Strategy into its evidence base.
- The Mayor's Environment Strategy must be updated with a full and current implementation plan, and all statutory strategies should be given weight within the London Plan.
- The Plan must be underpinned by specific, measurable environmental targets to meaningfully address the climate crisis.
- The Plan should adopt a holistic approach to environmental contamination, including contaminated land and chemical pollutants such as 'forever chemicals.'
- The Plan must reflect the London Assembly Environment Committee's recommendations on light pollution, including the need for a light pollution strategy.
- There is a need to ensure all parts of the current aviation policy remain in place in the new London Plan, no increase in aviation capacity and priority given to the decarbonisation of the industry.
- The Plan must prioritise decarbonisation of homes and essential infrastructure, especially given the current failure to meet retrofitting and traffic reduction targets
- Transport investment and planning needs to be rethought to work within constrained resources, making the most of fast to implement and effective options like cycling, walking, wheeling and buses.

### Further evidence

The London Food Strategy. Greater London Authority, December 2018

<https://www.london.gov.uk/programmes-strategies/communities-and-social-justice/london-food-strategy>

Keeping Out the Chill. London Assembly Environment Committee, February 2019

<https://www.london.gov.uk/programmes-strategies/turning-heat-cold-damp-and-mouldy-homes>

London's Retrofit Revolution: What's Going Wrong? Zack Polanski AM, September 2023

<https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-members/publications-zack-polanski/londons-retrofit-revolution-whats-going-wrong>

A Gender and Intersectionality Responsive Climate Adaptation Plan for London,.

GRRIPP and Zack Polanski, December 2023 <https://www.london.gov.uk/greens-call-citizens-assembly-adapt-changing-climate>

Involving Londoners in the pathway to Net Zero by 2030. London Assembly

Environment Committee, May 2025 <https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-work/london-assembly-publications/involving-londoners-pathway-net-zero-2030-0>

## 5.1 Energy efficiency standards

New buildings should all be planned to deliver net zero, the ability to deliver carbon savings off site has downsides. There is a real problem now that new homes that are built in London are not maximising the solar power they can deliver on their roofs, and that for buildings that are not individual dwellings the energy generated is not fed back into Londoners own bills.

There has been a scandalous lack of action in spending the funds collected under existing offsetting schemes. A clear plan needs to be in place for the delivery of offsets using both existing and future funding.

### **Key recommendations:**

- The Plan must include a commitment to deliver net zero for all new buildings.

- The Plan should include an aim that communal parts of buildings are built to function using the maximum of local power, reducing the use of energy from commercial electricity contracts, which can form a high proportion of service charges.

#### **Further evidence**

London councils yet to spend £130m in local climate funds. The Guardian, April 2025  
<https://www.theguardian.com/environment/2025/apr/26/london-councils-yet-to-spend-130m-in-local-climate-funds>

## **5.2 Heat networks**

Heat networks in London need to be run for the benefit of Londoners, not investors. Too many Londoners are already facing high costs for using heat networks, which by the nature of how they are installed are a natural monopoly. All heat networks should be run in community ownership with clear political and community oversight of their maintenance and operation. In the longer term, heat networks are best run as a municipal good, under the support of local or London-wide government.

#### **Key recommendation:**

- From January 2026, Ofgem will start to regulate heat networks – the London plan should support this regulation and ensure that heat networks planning guidance also supports design that will benefit customer service, reliability of supply, transparent billing and fair pricing.

#### **Further evidence:**

Heat networks. Ofgem, accessed June 2025  
<https://www.ofgem.gov.uk/energy-policy-and-regulation/policy-and-regulatory-programmes/heat-networks>

## **5.3 Whole Lifecycle Carbon and Circular Economy**

The reuse of existing materials in London from buildings demolished or refitted in London has been a positive step, but a move to avoid demolition, making refitting more effective and building a genuine circular economy is needed. Even well protected and funded homes like those in the Barbican building have seen local appeals to source parts removed from some flats so they can be reused, as the parts are valuable and no longer made. A London



wide push for salvage would be a good effective start at building a greater circular economy.

**Key recommendation:**

- The new London Plan should include support for space for services that support salvage – some of these already exist for architectural salvage, but a wider range of reclamation services will be necessary for a circular economy.

**Further evidence:**

Original fittings. Barbican Salvage Store, accessed June 2025

<https://barbicansalvage.org/donations/>

## **5.4 Waste**

London has continued to miss targets to increase recycling and reduce residual waste. It is unclear if the move to a limited Deposit Return Scheme (DRS) that does not include glass, and novel issues like vapes will be effective. The Mayor should lobby Government to widen the DRS if the scheme is effective to encompass all widely used potentially disposable but recyclable or reusable products.

The move to a circular economy needs more focus upon the value of what goes into the materials we use every day. Repair shops have sprung up on high streets for mobile phones, tablets and computers. Mechanics for vehicles including cycles, cars and vans are common in communities.

**Key recommendations:**

- The move to a circular economy means ensuring that basic repair facilities like these, and others supporting community and non-commercial purposes must be supported in planning.
- There remains a concerning reliance on the incineration of residual waste in London. There should be a clear strategy for the reduction of incineration to a minimum, covering only the waste that cannot be avoided. More work should be done with the NHS in particular on finding new approaches to avoid clinical waste.
- The new London Plan should have no support for any extra incineration capacity in London – the goal must now be to reduce residual waste to a minimum, and to realise the value in waste beyond simply burning it.

#### **Further evidence:**

Trash or treasure? Time to rethink our waste habits. London Assembly Environment Committee, March 2022

<https://www.london.gov.uk/press-releases/assembly/trash-or-treasure>

## **5.5 Green and open spaces, 5.6 London's Open Spaces, and 5.7 Green Infrastructure and biodiversity**

Londoners need high quality green and open spaces, and to have access to them. The Green Belt should be improved, not reduced. Too much of the Green Belt is difficult to access land with poor conditions for natural habitat, and that fails to provide support for sustainable farming, renewables and green corridors for people and wildlife. Caroline Russell AM's report *Gold Plate Our Green Belt* describes the green belt's functions as "a protective barrier around London: a home for wildlife, climate change mitigation, leisure and relaxation for stressed Londoners, and even some of our food. But it could do a lot more". The report had a series of important proposals that should be included in the London Plan. Managed carefully the green space around and within London is one of its best resources. It cannot be replaced if it is lost, and if wisely managed it can be enriched, not eroded.

CPRE London have made some sensible suggestions about how the green spaces should be "identified and designated and/or safeguarded in the Plan for sports and recreation, habitat, food growing and rainwater management". This would be a good start to delivering more for Londoners and for nature from the green belt with a more strategic approach.

### **Key recommendations**

- The Plan should emphasise the need for the Green Belt to be improved to enable it to work better as a natural flood defence, and help be a further protection for London and the nature within it.
- The Plan should incorporate the need for better network of paths in the green belt for walking and cycling, fully accessible by public transport and this should be promoted to all Londoners.
- Wildlife corridors need to be created to connect large green spaces, and smaller green spaces should be made by adding green features to smaller infrastructure like bus stop shelters. Major roads and railways which divide up green spaces should have green bridges added.
- The Plan should include large scale planting of native tree species to increase woodland in the green belt.
- Renewables at a small or medium scale should be placed in suitable parts of the green belt to help reduce London's carbon footprint.

- The Plan should encourage food growing in the green belt should be increased, with new models for access trialled.
- London wide strategies that address the provision and use of green space for habitat, recreation and other purposes should be pursued, learning from the suggestions by CPRE.

#### **Further evidence**

Gold Plate Our Green Belt. Caroline Russell, February 2020

[https://www.london.gov.uk/sites/default/files/gold\\_plate\\_our\\_green\\_belt\\_caroline\\_russell\\_feb\\_2020.pdf](https://www.london.gov.uk/sites/default/files/gold_plate_our_green_belt_caroline_russell_feb_2020.pdf)

Green Bridges: safer travel for wildlife, Natural England, July 2015

<https://www.gov.uk/government/news/green-bridges-safer-travel-for-wildlife>

London Green Belt under threat, CPRE, June 2025

<https://www.cprelondon.org.uk/news/london-green-belt-under-threat-please-take-action-now-deadline-22-june/>

## **5.8 Water, 5.9 Strategic importance of Waterway, 5.10 Flood risk management, and 5.11 Water management**

Water management needs to be planned into every development – both to consider times of water shortage and of times of sudden heavy rainfall. New developments are already being constructed in ways to reduce the immediate impact on sewers, but the water stored in these facilities is then not available to residents to use for watering their own green spaces – leading to increased cost and water usage.

One of the weaknesses of policy on rivers, water and other blue spaces is that they are very fragmented and hard for the public and policy makers to clearly engage with. A stronger steer within the London Plan and in other Mayoral policy including upcoming work on healthy and clean rivers to reference and guide a strategic London policy on rivers, especially the Thames is needed.

All developments that are putting in place new forms of water management including Sustainable Drainage Systems (SUDs) should also be compelled to consider how to use these to build in water recycling uses for green spaces. In addition – grey water should be captured for uses like flushing toilets. It simply isn't necessary for all water used in London to be of drinking water quality. Some pioneering developments have adopted such practices for some time, such as the Millennium Dome and BedZED, but the challenge needs to be met to adopt within business as usual and in smaller developments including residential.

### **Key recommendations:**

- The Plan should require all developments using new water managements systems to integrate water recycling for green spaces.

- Grey water – scale up initiatives to use waste water that comes from activities within buildings so it is captured and reused purposes like flushing toilets, and watering green spaces.
- Waterways should be safeguarded for the strategic use but also available to Londoners as valuable blue space and with ways of using the water for recreation in safe ways.
- London Plan policy should work in tandem with other Mayoral work to provide a strategic aim uniting all wider policy on rivers and blue spaces.

#### Further evidence

[Case Study 5 - Resilient Water Supply Case Study](#), PR19 Appendix 5 – Innovation, Thames Water, 2019

## 5.12 Transport's role in London's **good** growth

At Mayor's Question Time on 19 June 2025, the Mayor admitted that London is not on track to meet the target to reduce car vehicle kilometres travelled on London's roads by 27 per cent by 2030, citing the impact of the pandemic. The targets in the Mayor's Transport Strategy are similarly not on the right trajectory. The Mayor has ruled out introducing road user charging and the Comprehensive Spending Review (CSR) failed to give TfL the capital investment the Mayor has been requesting for big public transport infrastructure, both of which would have helped him reach these targets. Therefore, the next London Plan will need to demonstrate very clearly how its policies to support walking, wheeling and cycling will reduce car usage and help achieve the targets in the Mayor's Transport Strategy.

### Alternatives to motor vehicle provision

One area of focus should be reconsidering projects that prioritise motor vehicle use. Alternatives to motor vehicle provision should be considered, as outlined in Siân Berry's 2022 report, *Better Ways to use the Silvertown Road Tunnel*, which proposed various different public transport options for repurposing a tunnel originally designed exclusively for motor vehicles and would likely increase car vehicle kilometres travelled on London's roads.

### Using APTALs to measure accessibility and determine parking density

The next London Plan should be more forward thinking than the last and its policies should actively support the targets in the Mayor's Transport Strategy. Parking policies for new developments should include zero car parking levels, except for people with disabilities that mean a car is required.

Current parking policies in the London Plan allow for up to 1.5 parking spaces per dwelling, depending on the Public Transport Accessibility Level (PTAL) assessments for the locality of a new development. The methodology that calculates PTALs dates back to 1992 and

focuses on distance to the nearest routes and services available. They do not measure ease of use of the service, which is particularly important for disabled people.

In January 2024, the Transport Committee wrote a letter to the Mayor with 12 recommendations following its investigation into Transport in Outer London.

### **Improved Connectivity to public transport in Outer London**

The Transport Committee's conclusions and recommendations cover the following areas:

- The need for more strategic planning and co-ordination in Outer London and with neighbouring authorities.
- The need to learn from the Superloop and provide more orbital transport options.
- The vital importance of Turn Up And Go (TUAG) services to support public transport use.
- The need for funding for new transport infrastructure in Outer London.
- Where accessibility levels are low in an area, the first consideration in planning decisions should be to ask for contributions from developers to help improve accessibility by foot, bike and public transport to acceptable levels. Only in the very rare cases where this is objectively impossible should deviation from zero parking standards be accepted.

### **Turn to the Thames for freight**

In December 2023, the Transport Committee wrote a letter to the Mayor with seven recommendations following its investigation into London's river transport services. Two of these were that the Mayor should:

- continue to support future light freight trials and work together with other stakeholders to find ways to scale the volumes of freight being transported and overcome current barriers.
- publish an update to his pier strategy in 2024-25, which should be expanded to cover both passengers and light freight. It should include:
  - updating projections for further growth in passenger travel;
  - proposals for TfL to increase pier capacity in central London;
  - options for providing electric charging infrastructure for vessels on TfL piers; and
  - research into new ways to increase the capacity for roll-on/roll-off (RORO) ferry support and other methods that can more efficiently load and unload light freight and bicycles in key locations.

### **Reduce road danger**

The Mayor is off target to meet Vision Zero by 2041 with no one being killed or seriously injured on London's roads. Research from TfL shows that the number of people killed or seriously injured on London's roads reduced by 34 per cent following the introduction of 20mph speed limits. In light of this research TfL should be trialling reducing speed limits

further to 10mph on roads passing sensitive locations like schools, hospitals, doctor's surgeries, shops, leisure facilities and more.

### **Key recommendations**

- The Transport Evidence Compendium from the UK Energy Research Centre's transport programme should be used to inform the policies proposed in the new London Plan to ensure it helps make transport in London zero carbon, cleaner and healthier.
- All the proposals from Siân Berry's report, Better Ways to use the Silvertown Road Tunnel should be considered when new transport connections are proposed for London, where appropriate.
- The next London Plan should consider all options for financing much-needed public transport improvements and enhancements to reduce car vehicle kilometres travelled on London's roads by 27 per cent by 2030.
- The next London Plan should consider implementing Accessible Public Transport Accessibility Level (APTAL) assessments to measure public transport accessibility and to determine parking densities.
- All new housing development should be built with zero car parking, except for disabled parking. To improve accessibility by foot, bike and public transport to acceptable levels for new developments, planning decisions should ask for contributions from developers to improve them. Only in the very rare cases where this is objectively impossible should additional car parking spaces be provided.
- In light of the evidence supporting 20mph speed limits to reduce road danger, the Plan should trial reducing speed limits further to 10mph on roads passing sensitive locations like schools, hospitals, doctor's surgeries, shops, leisure facilities and more.

### Further evidence:

UKERC Transport Evidence Compendium. UK Energy Research centre, May 2025  
<https://d2e1qxpsswcpgz.cloudfront.net/uploads/2025/05/UKERC-Transport-Evidence-Compendium-final.pdf>

Better ways to use the Silvertown Road Tunnel. Siân Berry, June 2022  
[https://www.london.gov.uk/sites/default/files/2022-12/2022\\_12\\_19\\_Silvertown\\_Options\\_Brochure\\_FINAL.pdf](https://www.london.gov.uk/sites/default/files/2022-12/2022_12_19_Silvertown_Options_Brochure_FINAL.pdf)

Future Road User Charging in London. London Assembly Transport Committee, March 2025  
<https://www.london.gov.uk/sites/default/files/2024-03/Future%20Road%20User%20Charging%20in%20London%20report.pdf>

Accessibility review of the PTAL Index. A report for Transport for All, January 2024  
[https://www.motabilityfoundation.org.uk/media/4w1erfiz/rpt\\_public-transport-accessibility-level-review\\_150124-clean\\_accessible.pdf](https://www.motabilityfoundation.org.uk/media/4w1erfiz/rpt_public-transport-accessibility-level-review_150124-clean_accessible.pdf)

Letter to Mayor on transport in outer London. London Assembly Transport Committee, January 2024  
<https://www.london.gov.uk/sites/default/files/2024-01/Outer%20London%20Letter.pdf>

Letter to Mayor on River Services. London Transport Committee, December 2023  
<https://www.london.gov.uk/sites/default/files/2023-12/River%20Services%20Letter%20to%20Mayor.pdf>

Powerful new long-term TfL research shows 20mph speed limits save lives on London's roads. Transport for London, May 2025  
<https://tfl-newsroom.prgloo.com/news/powerful-new-long-term-tfl-research-shows-20mph-speed-limits-save-lives-on-londons-roads>

Road danger reduction strategy. Lambeth Council, accessed June 2025  
<https://moderngov.lambeth.gov.uk/documents/s151433/Appendix%201%20-%20Lambeth%20Road%20Danger%20Reduction%20Strategy%20%20Compressed.pdf>

Vision Zero. City of London Corporation, accessed May 2025  
<https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-corporation-vision-zero-plan.pdf>

Determining Safe Speeds, Road Safety Foundation, Apr 2025,  
<https://roadsafetyfoundation.org/project/determining-safe-speeds/>



## 5.13 Sustainable transport networks to support **good** growth

### **Initiate a walkable district policy strategy**

The London Growth Plan published in February 2025, says: “Frontier innovation thrives in walkable districts.” Yet it contains no proposals for growing active travel. Walking and wheeling are the most affordable forms of transport, create livelier town centres and support thriving local high streets.

### **Neighbourhoods that support walking, wheeling and cycling**

Minimising car use linked to new developments can be supported through planning that ensures all the food, facilities and necessities residents require are within a 20-minute walk, wheel or trip by public transport. Richmond’s Local Plan, which is currently in its examination stage, provides a strong example of how planning can support reduced car use in new developments.

### **Boost bus lanes’ effectiveness**

There is more to be done to increase bus effectiveness. Make more bus lanes operate 24/7, introduce bus priority signals, and bring in more bus gates. See the recommendations in TravelWatch’s report Making Buses Better, the findings in Gear shift: International lessons for increasing public transport ridership in UK cities, from Centre for Cities, and those How Technology Can Improve Bus Reliability in Greater Manchester, TPS Bursary Paper 2016.

### **Make streets safe, accessible and navigable for all**

CPRE London has published 12 design elements for residential streets, based around Healthy Streets which enable active travel and reduce road danger. Residential streets should include a crossing every 100 metres with clear sight lines and flush drop kerbs. All junctions should be clear of parked cars with small turn radii. There should be regular street parks for seating where residents can rest, meet and play. All pavements should be clear and even with no obstructions and a minimum two metre width.

### **Key recommendations:**

- The Plan should create cycleways people want to use and require boroughs to assess and improve the accessibility of cycling networks, as recommended by Inclusion London, with consideration for non-standard cycles, such as tricycles and adapted bikes, which disabled people use.
- The Plan should include detailed proposals for walkable innovation districts, beyond the pedestrianisation of Oxford Street, linking this with accessible housing and transport infrastructure.
- The next London Plan should promote the adoption of walkable neighbourhoods in new developments to reduce car dependency and enable active travel.

- The Plan should make more bus lanes operate 24/7 and introduce bus priority signals and gates to improve bus reliability.
- We support Inclusion London's recommendation that the next London Plan requires Boroughs to incorporate in their local plans a detailed assessment of the accessibility of the wider built environment, particularly street space design and infrastructure, to ensure that sustainable transport is genuinely accessible to disabled Londoners. This should include mapping quiet, warm, and safe spaces in public areas. Boroughs should be explicitly required to link accessible housing planning and provision to accessible transport infrastructure and the overall accessibility of local environments, ensuring a joined-up approach that supports independent living.

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## Public toilets

Toilets are integral to ensuring all Londoners and visitors can travel safely and healthily around London. Yet, too many people are restricted by a 'loo leash' due to the lack of free, accessible public toilets available for everyone.

The Health Committee's November 2021 report, *The Toilet Paper*, highlighted the health reasons why public toilets are essential. The report states:

"Providing accessible and clean toilets is not a nicety but a necessity. A decline in the provision of public toilets can have significant consequences for the overall wellbeing and health of Londoners – and, more broadly, the cleanliness, safety, security and prosperity of our streets, green spaces and parks. Research has shown that public toilets are vital components in creating sustainable, accessible, inclusive cities. Tourists and visitors also rank the availability of toilets high in their lists of reasons a location is worth visiting."

Caroline Russell's August 2023 report, *The London Loo League Table*, exposed the loo 'deserts' on the TfL tube, tram and DLR network.

The Mayor has put £3 million per year over five years to installing new toilets and upgrading existing facilities on the transport network and the Good Growth Fund is supporting the installation of 331 new toilets and urinals, not all of which are open to the public.

However, as Age UK London's January 2025 report, *Lifting the Lid*, found:

"Over the last decade, three times as many public toilets have been closed by local authorities as have been opened. Just three of the 30 local authorities that participated in the research had opened more public toilets than they had closed."

On 5 June 2025, the London Assembly unanimously passed a motion calling on the Mayor to write to the Mayor to make toilets a statutory duty for Councils to provide, conditional upon the provision of additional ringfenced funding to support this new duty.

### **Key recommendations:**

- The 2021 London Plan does not refer to public toilets in parks and other green spaces. Public toilets in parks make up a significant proportion of local authority maintained public toilets in London. In some cases, provision is linked to franchise agreements with park cafes. The updated London Plan should reflect this.
- Ongoing management, cleaning of facilities and funding should be secured and agreed at the planning stage to ensure long-term provision of accessible, free public toilets is achievable.
- The 2021 London Plan does not refer to signage or other wayfinding for public toilets. Good signage so that people know where available public toilets are located

is crucial. This must include good information about the location of accessible public toilets. The new London Plan should address this.

- The new London Plan should require local plans to map the availability and accessibility of essential facilities such as public toilets, including Changing Places toilets, which are vital for many Disabled people's participation in the community, plus a needs assessment based on listening to residents to identify gaps in provision.

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## 5.14 Car parking, cycle parking and deliveries

### Save front gardens

While reducing car parking in new developments is welcome, it's equally important to take stronger action against the paving of front gardens for parking, an issue linked to increased urban heat, pollution and decline of pollinators. This concern is raised in both CPRE *London's Front Gardens on the Front Line* publication and highlighted in the 2024 *London Climate Resilience Review*.

### Bring in a kerbside strategy

The kerbside is a publicly owned space and should be utilised for more than just storing private cars. We should prioritise people walking, wheeling and cycling, safety and climate

resilience instead. Lambeth Council has introduced a kerbside strategy to help it achieve its target of 25 per cent of kerbside being dedicated to supporting resilience to climate change. Instead of parked cars, kerbside will be given over to sustainable drainage systems (SuDs), street trees, community and business parklets, cycle lanes, pedestrian crossings, bus lanes and bus stops, shared scooter / bike bay, car club bays, EV bays, School Keep Clear areas, taxi bays, cycle hangars, and loading and disabled bays.

London CPRE has published 12 design elements for residential streets, the majority of which echo Lambeth's kerbside strategy, with residential, disabled parking spaces, loading bays and car share bays marked. Secure resident and visitor cycle parking is also included along with rain gardens and build outs for street trees.

### **Cater more for car clubs and carpooling**

In 2024-25, the Transport Committee carried out an investigation into car clubs and produced a report which found that car club use had not achieved its potential. The report notes:

*"In 2015 a Strategy for Car Clubs was jointly developed by TfL, London Councils, the GLA and a coalition of car club operators and key stakeholders. The Plan aimed to "grow car clubs into a mainstream alternative to the private car for essential car journeys in London and grow the membership of car clubs to one million users in London by 2025. In 2023, CoMoUK data showed there were 258,570 active car club members in London."*

Carpooling has yet to take off in UK, whereas in France it is becoming normalised, particularly with the use of apps to facilitate ride sharing and government subsidies.

### **Convert car parks into other uses**

There is significant potential to repurpose car parks in London to improve the city for all, by enabling housing to be built on car parks to reduce pressure on the Green Belt and MOL. Creating more homes in central London locations or at transport links on sites currently used to house cars will also help to support the vibrancy of London's neighbourhoods and town centres.

Cutting available parking reduces demand for vehicle use, which helps to cut congestion and thereby speeds up bus journey times – as can be seen by the impact of the Covid lockdowns on bus journey speeds.

Car parks that are not suitable for housing could instead be converted into 'Welfare and Mobility Hubs', serving non-office-based workers including couriers, postal workers, private hired drivers and bus drivers. These hubs could provide fast charging for electric and alternatively fuelled vehicles, rest areas for workers, toilets and other amenities to support workers in the transport and delivery sector.

### **Key recommendations:**

- The London Plan should implement stronger policies to protect front gardens and reduce the paving over of gardens for motor vehicles.
- The London Plan should prioritise reallocating kerbside spaces to support walking, wheeling, cycling, greening and climate resilience.
- The Plan should consider annual charges for dropped kerbs, rather than one off charge and ensure that accessible street space is prioritised, and methods for making kerbsides not just for cars are considered.
- In the next London Plan, the Mayor 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.
- The Plan should include measures to invest in making carpooling more attractive and should consider the developments of apps and government subsidises to normalise the practice.
- The Plan should outline measures to create more parking for e-cargo bikes to support the move by the freight industry to electric and alternatively fuelled vehicles.
- The Plan should include policies to prioritise converting car parks into housing for people instead of for vehicles.
- The Plan should include measures to repurpose car parks in London to create space for non-office-based workers such as courier and bus drivers.
- The next London Plan should include a kerbside strategy and incorporate London CPRE's 12 design elements for residential streets.

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## 5.17 Air quality

The all London ULEZ and other related work on air pollution from road sources have been welcome initiatives, however a commitment to the 27 per cent reduction in road traffic that was adopted in Proposal 24.1 of the Mayor's Transport Strategy is needed.

The lack of clear data on the impact of the Air Quality Positive policy is a concern, and it is important that action is taken to reach the new WHO targets in all areas. With Zero Emission Zones now not being taken forward, there is a need for new policy to champion the changes needed to further reduce air pollution by actions like reducing traffic, replacing gas boilers with zero emission alternatives and tackling commercial emissions.

### **Key recommendation:**

- The new London Plan must make a clear path for development in London to make air in London within new WHO targets from non-road sources and support the actions necessary to reduce air pollution from road sources to the minimum possible, including by reducing motor traffic.

## 5.18 Heat risk and Healthy Communities

Heat risk must be considered not only from the materials used but the colours chosen, and further attention given to the risks of substitution of materials at a late stage during developments. Greening should be given a focus to community supporting works, where residents can manage their green space, use it to help provide food growing, and also bring people together.

### **Key recommendations:**

- The new London Plan should support councils, developers and planners in ensuring that the materials and colours used reduce heat risk in new and refurbished developments.
- The new London Plan should support new work that involves Londoners in the changes needed to adapt the urban realm and buildings to be more resilient to higher temperatures and provide space to shelter from them.

## Plans for monitoring and review

The final document should also include a requirement to report outcomes from new policies back to the Mayor in a standard format, in a way that accurately tracks the impacts from implementing the Plan. This would give the Mayor the opportunity to provide Supplementary Planning Guidance in areas where the Plan is not working as expected.