MDA No.: 1901

Title: Scrutiny of the Draft London Plan

1. Executive Summary

1.1 At the Planning and Regeneration Committee meeting on 4 September 2026, the Committee scrutinised the Draft London Plan and resolved that:

Authority be delegated to the Chair, in consultation with the party Group Lead Members, to agree any output arising from the discussion.

1.2 Following consultation with party Group Lead Members, the Chair of the Planning and Regeneration Committee has agreed the Committee's letter to the Mayor of London in response to the consultation on the Draft London Plan, as attached at **Appendix 1**.

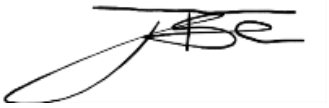
2. Decision

2.1 **That the Chair of the Planning and Regeneration Committee, in consultation with party Group Lead Members, agrees the Committee's letter to the Mayor of London in response to the consultation on the Draft London Plan, as attached at Appendix 1.**

Assembly Member

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

The above request has my approval.

Signature: 

Printed Name: **James Small-Edwards AM, Chair of the Planning and Regeneration Committee**

Date: **14/10/2026**

3. Decision by an Assembly Member under Delegated Authority

Background and proposed next steps:

3.1 The terms of reference for this investigation were agreed by the Chair, following consultation with party Group Lead Members, under the standing authority granted to Chairs of Committees and Sub-Committees. Officers confirm that the letter and recommendations fall within these terms of reference.

3.2 The exercise of delegated authority approving the letter to the Mayor of London will be formally noted at the Planning and Regeneration Committee's next appropriate meeting.

Confirmation that appropriate delegated authority exists for this decision:

Signature (Committee Services): L J Harvey

Printed Name: Lauren Harvey

Date: 30 September 2026

Financial Implications: NOT REQUIRED

Note: Finance comments and signature are required only where there are financial implications arising or the potential for financial implications.

Signature (Finance): Not Required

Printed Name:

Date:

Legal Implications:

The Chair of the Planning and Regeneration Committee has the power to make the decision set out in this report.

Signature (Legal): 

Printed Name: Rory McKenna, Monitoring Officer

Date: 14 October 2026

Email: rory.mckenna@london.gov.uk

Supporting Detail / List of Consultees:

- Andrew Boff AM; and
- Benali Hamdache AM.

4. Public Access to Information

4.1 Information in this form (Part 1) is subject to the FoIA, or the EIR and will be made available on the GLA Website, usually within one working day of approval.

4.2 If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.

4.3 **Note**: this form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 - Deferral:

Is the publication of Part 1 of this approval to be deferred? NO

If yes, until what date:

Part 2 – Sensitive Information:

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

Is there a part 2 form? NO

Lead Officer / Author

Signature: Meghan Doyle

Printed Name: Meghan Doyle

Job Title: Senior Policy Adviser

Date: 09/10/2026

Countersigned by Executive Director:

Signature: 

Printed Name: Helen Ewen, Executive Director of Assembly Secretariat

Date: 13/10/2026

Appendix 1

LONDONASSEMBLY

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Kamal Chunchie Way
London E16 1ZE
Tel: 020 7983 4000
www.london.gov.uk



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

Lord Khan of Tooting
Mayor of London
(Sent by email)

15 October 2026

Dear Lord Khan,

Scrutiny of the Draft London Plan 2026

I am writing to submit the Planning and Regeneration Committee's response to the consultation on the Draft London Plan, published in July 2026[1]. This response draws on a range of evidence we have gathered since the Plan was published, as well as through our recent investigations.

Since the Plan was published for consultation, we have organised two public and stakeholder engagement events in August and September. These were focussed on hearing from a diverse range of Londoners to inform our response to the consultation.[2] On 5 August, we held two interactive workshops which were attended by 41 young Londoners (aged 11-17) and 27 adults. On 2 September, we convened 58 stakeholders at City Hall from across the housing, transport, business and environment sectors to discuss the priorities and challenges presented by the Draft Plan. The London Assembly Research Unit has provided a detailed summary of the discussions and debates heard through these events, which are submitted alongside this letter.

We also held a formal meeting on 4 September with the Deputy Mayor Jules Pipe CBE and officers from the GLA London Plan team, which formed part of a wider programme of London Assembly meetings on the topic.[3]

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[1] GLA. (2026). Draft London Plan 2026

[2] London Assembly. (2026). London Assembly webpage on Draft London Plan scrutiny programme

[3] These include the London Assembly plenary meeting on 10 September 2026, as well as the Planning and Regeneration Committee roundtable event on 2 September with stakeholders, which the Chair of the Environment Committee attended.

We are grateful to all the different stakeholders who have taken the time to share their views with us and answer our questions.

How the Plan responds to the unique challenges of 2026 and beyond

There is widespread recognition of the significant economic and geopolitical headwinds within which this particular London Plan is being developed. So too, the scale of the housing crisis it is seeking to address. In the Foreword to the Draft Plan, you set out the ambition to "fix the housing crisis", while recognising the "perfect storm for housebuilding in London".[4]

This complexity has only been compounded by the Government's recent consultation on revisions to the National Planning Policy Framework (NPPF). With the final changes to the NPPF not published until August, and after the Draft Plan went out for consultation,[5] the Assembly has heard that your officers are still working through the detail on how those changes will impact the approaches proposed in this draft.[6]

We are not blind to these challenges. The Plan is visibly pulling in many directions, trying to find the right balance between future aspiration, current need and economic reality. A great effort has also gone into slimming down this Plan with a view to addressing the complexity we have been critical of in the current Plan.[7]

Yet, several questions remain concerning the deliverability and ambition of the Plan. As such, in the rest of this letter, we have identified six key areas where we believe the Draft Plan could be strengthened to better meet the needs of Londoners over the duration of the Plan's existence.

Deliverability of housing targets (Policy HN1)

The Draft London Plan establishes a target to deliver 558,000 new homes over the next ten years.[8] This figure is based on an assessment of what the GLA considers to be "feasibly deliverable" over the next decade, taking into account viability and build-out rates, and modelling what is possible through the policies proposed in the new Draft Plan.[9] This falls short of the Government's assessment of London's housing need: 850,000 new homes over the next ten years.[10] At the same time, it would require a significant increase in housebuilding compared with housing starts since the pandemic.

When questioned on the deliverability of the 558,000 target, the Deputy Mayor repeated the phrase that the figure was "theoretically plausible", but only if three conditions were met.[11] These conditions included a significant economic upturn, sustained investment in public transport infrastructure and a "massive increase in affordable housing grant".[12]

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[4] GLA. (2026). Draft London Plan 2026 pdf, Foreword, pg. 6

[5] National Planning Policy Framework - GOV.UK

[6] London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 1, pg. 14-15

[7] London Assembly Planning and Regeneration Committee, Unlocking development in London, March 2025

[8] GLA. (2026). Draft London Plan 2026, pg. 8

[9] GLA. (2026). Draft London Plan 2026, pg. 8

[10] Pegasus Group. (2026). Local housing need is increasing but delivery isn't keeping up

[11] London Assembly Planning and Regeneration Committee. (2026). Transcript from 4 September 2026 Meeting

[12] London Assembly Planning and Regeneration Committee. (2026). Transcript from 4 September 2026 Meeting

During our 2 September stakeholder event at City Hall, we heard widespread scepticism about the deliverability of these targets, particularly given actual progress against current housing targets.[13] Given the global economic uncertainties, pressures on the public purse and the Deputy Mayor's own acknowledgment of the current housing grant as the "most generous settlement" to date[14], we share the same scepticism of many of our guests about the deliverability of this target.

Since it will undoubtedly form a key part of the Examination in Public (EiP), we also questioned the Deputy Mayor on how the GLA planned to defend the level of ambition. He set out the range of assessments underpinning the target, before acknowledging, "I suppose we pitched it at 558,000 to enable that discussion to be played out at the EiP and within this consultation now".[15] He went on to say, "the EiP is going to be a real test bed for what is achievable and what is really needed", as well as a debate about design expectations and growth.

Given the experience from the last EiP process, the Committee encourages the GLA to ensure its defence of this target at the EiP does not result in watering down standards and protections set out in the rest of the Plan.

Affordable housing targets (Policy HN3)

The Draft Plan also introduces a new locational threshold approach to affordable housing. Rather than the 35 per cent target set for the whole of London through the 2021 London Plan, boroughs have been set different bands of 20/25/35 per cent based on a number of factors.[16] We heard from Nina Miles, interim head of the London Plan, GLA, about some of the factors that went into this calculation:

> "There were various elements that have gone into the determination of the different bandings. We looked at, for example, the geography of each borough, their sales values within that, and the range of sales values, looking at lower/upper averages to understand how that relates to wider sales values."[17]

Recommendation 1. The GLA should release the methodology and data that led to the allocation of the different bands to give confidence in these requirements to local authorities, developers and the public.

Building height and density (Policy MBUL2)

Policy MBUL2 Optimising the use of land and site capacity aims to "ensure development makes the best use of land and to make the most of all opportunities on brownfield land"[18]. It applies to all local plans and development proposals, across all locations. Under this policy, the GLA has

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[13] London Assembly. (2026). Draft London Plan Engagement Events

[14] London Assembly Planning and Regeneration Committee. (2026). Transcript from 4 September 2026 Meeting

[15] London Assembly Planning and Regeneration Committee. (2026). Transcript from 4 September 2026 Meeting

[16] GLA. (2026). Draft London Plan 2026 pdf, pgs. 83-89

[17] London Assembly Planning and Regeneration Committee. (2026). Transcript from 4 September 2026 Meeting

[18] GLA. (2026). Draft London Plan 2026 pdf, pg. 28

established a new model for assessing appropriate ranges for density and height for a given site, known as the Optimisation Framework.[19]

This approach provides encouragement towards mid-rise development in London, something the Committee explored extensively in our report, *Between skyscrapers and semis: London's missing mid-rise housing*.[20] The Committee acknowledges this new approach to mid-rise development in the Draft Plan, including the introduction of a new definition for mid-rise and the proposal of mid-rise as the new baseline for development.[21]

In its report, *Between skyscrapers and semis: London's missing mid-rise housing*[22], *the* Committee had called for a reinstatement of the Density Matrix included in earlier iterations of the London Plan before it was removed in the 2021 Plan.[23] While we were told emphatically by the Deputy Mayor and London Plan team that it is not a return to the Density Matrix, the Committee notes the introduction of the Optimisation Framework[24] as a tool for managing density, as well as the introduction of height ranges[25].

Overheating of homes (Policy GHR4)

The Committee recently published its report, *Hot property: how planning can help Londoners beat the heat*.[26] In this, we explored what could be done to address the fact too many Londoners are experiencing worryingly hot homes and welcomed the Draft London Plan's greater emphasis on external shading, setting the expectation that it will be used on windows receiving direct sunlight.

We note the wider piece of work the GLA has launched to address overheating in London. The *Heat Ready London*[27] plan was published during this record-breaking summer and sets out 37 priority areas for action, covering six key sectors, including the built environment. Much of this work though will necessarily happen outside of planning.

Where the Draft London Plan needs to work harder is in ensuring overheating and thermal efficiency is designed in from the outset. For the Draft Plan's expectations around shading to be met, there needs to be more guidance that demonstrates how external shading and other passive cooling measures can be sensitively integrated into design, alongside active cooling measures where necessary.

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[19] GLA. (2026). Draft London Plan 2026 pdf, pg. 30

[20] London Assembly Planning and Regeneration Committee. (2026). Between semis and skyscrapers: London's missing midrise housing

[21] GLA. (2026). Draft London Plan 2026 pdf, pg. 41

[22] London Assembly Planning and Regeneration Committee. (2026). Between semis and skyscrapers: London's missing midrise housing, pg. 8

[23] London Assembly Planning and Regeneration Committee. (2025). Towards a new London Plan consultation response

[24] GLA. (2026). Draft London Plan 2026, pg. 30

[25] London Assembly Planning and Regeneration Committee. (2026). Transcript from 4 September 2026 Meeting

[26] London Assembly Planning and Regeneration Committee. (2026). Hot property: how planning can help Londoners beat the heat

[27] GLA. (2026). Heat Ready London

Recommendation 2. We encourage the GLA to work with expert organisations (such as Shade the UK and the Good Homes Alliance) to develop Supplementary Planning Guidance for shade and passive cooling.

Increasing temperatures have become a "growing reality in our city"[28] experienced through the record-breaking heatwaves experienced in 2026. With the Met Office forecasting unprecedented El Nino events driving an increase in global temperatures, with predictions of 2027 "very likely to replace 2024 as the warmest year on record".[29]

In response, the Committee believes there is a role for the GLA to play in providing advice to Londoners on available options for active cooling solutions in response to severe heatwaves where homes are at serious risk of overheating. This guidance would be targeted at those Londoners who find themselves in overheating properties where passive cooling measures have not been sufficiently adopted by developers, or do not work sufficiently well, in response to increasing severe heatwaves in the capital. The guidance could offer practical advice on cost efficient, environmentally sustainable solutions.

Recommendation 3. The GLA should produce guidance for Londoners as a matter of urgency on the use of active cooling solutions in response to severe heatwaves in London, including options that promote cost efficiency and environmental sustainability.

Data centre policy (Policy GLE3)

We are all too aware of the increasing relevance of data centres to the UK economy. But so too, their potential impacts on essential infrastructure, housing and the environment. As such, we have been calling for action in London to manage their growth sustainably.[30] The Committee's report, *Gridlocked: How planning can ease London's electricity constraints*, identified several challenges which we hope a new stand-alone data centre policy can help address.[31] The new policy GLE3 aims to "set strategic criteria in order to meet the need for data centres in suitable locations in London while mitigating disproportionate impacts and delivering benefits for the local community and environment".[32]

In our report, we highlighted specific challenges for boroughs around the novelty and complexity of planning applications for data centres. When paired with limitations on borough capacity and technical expertise, it is evident the success (or otherwise) of this policy will hinge on its implementation by boroughs – how, when and where they identify suitable locations.

The Deputy Mayor committed to develop "a common understanding [...] of what good looks like" regarding data centres in London with the expressed intent of producing guidance as a supplement

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[28] GLA. (2026). Heat Ready London, Foreword, pg. 3

[29] Met Office. (2026). An unprecedented El Nino and its implications for the weather forecast

[30] London Assembly Planning and Regeneration Committee. (2025). Gridlocked: How planning can ease London's electricity constraints

[31] London Assembly Planning and Regeneration Committee. (2025). Gridlocked: How planning can ease London's electricity constraints

[32] GLA. (2026). Draft London Plan 2026 pdf, pg. 130

to the London Plan.[33] This could help boroughs as they grapple with an increased demand for data centres.

Stakeholder and public engagement

Throughout our public and stakeholder engagement events, we heard from Londoners and experts working in the field about the importance of listening to and incorporating diverse perspectives and range of lived experience into the London Plan.[34] Young and adult Londoners shared with us that they welcomed the opportunity to share their insights and experience of living in London through events such as our public engagement events in August 2026. They asked for more opportunities like this to speak directly to the Mayor to inform policy that directly affects their everyday lives in the capital.

Recommendation 4. We encourage the GLA to provide greater opportunities through the delivery of community-based engagement events with Londoners, including young people, and stakeholders in shaping the final London Plan.

We look forward to consideration being given to the feedback and recommendations made in this consultation submission and hope to see this incorporated in the final version of the London Plan.

Yours,



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

[33] London Assembly Planning and Regeneration Committee. (2026). Transcript from 4 September 2026 Meeting

[34] London Assembly. (2026). Draft London Plan Engagement Events