MDA No.: 1902

Title: Draft London Plan

1. Executive Summary

1.1 At the Transport Committee meeting on 8 September 2026, the Committee discussed 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 agreed the Committee's letter to the Mayor of London on the draft London Plan, as attached at **Appendix 1**.

2. Decision

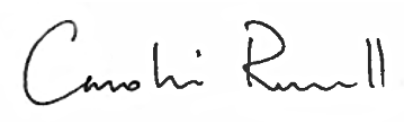
2.1 **That the Chair, in consultation with the party Group Lead Members, agrees the Committee's letter to the Mayor of London on the draft London Plan, as attached at Appendix 1.**

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: Caroline Russell AM, Chair of the Transport Committee

Date: 14 October 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, in consultation with relevant party Group Lead Members under the standing authority granted to Chairs of Committees and Sub-Committees. Officers confirm that the letter and its recommendations fall within these terms of reference.

3.2 The exercise of delegated authority approving the letter will be formally noted at the Transport Committee's next appropriate meeting.

Confirmation that appropriate delegated authority exists for this decision:

Signature (Committee Services): *Hannah Barlow*

Printed Name: Hannah Barlow, Principal Committee Manager

Date: 14 October 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 Transport Committee has the power to make the decision set out in this report.

Signature (Legal): 

Printed Name: Rory McKenna, Monitoring Officer

Date: 15 October 2026

Email: MonitoringOfficer@london.gov.uk

Supporting Detail / List of Consultees:

- Elly Baker AM (Deputy Chair);
- Thomas Turrell AM;
- Hina Bokhari OBE AM; and
- Keith Prince 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: *Ellie Haigh*

Printed Name: Ellie Haigh

Job Title: Senior Policy Adviser

Date: 14 October 2026

Countersigned by Executive Director:

Signature: 

Printed Name: Helen Ewen, Executive Director for Assembly Secretariat

Date: 14 October 2026

Appendix 1

LONDONASSEMBLY

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Caroline Russell AM
Chair of the Transport Committee

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

15 October 2026

Dear Sadiq,

London Assembly Transport Committee consultation response: draft London Plan

I am writing to submit the London Assembly Transport Committee's response to the consultation on the draft London Plan.[1] This submission draws on evidence gathered at our meeting on 8 September 2026 where we questioned Seb Dance, Deputy Mayor for Transport and officers from the GLA and TfL. It also draws on past scrutiny of related and relevant investigations. At this meeting the Committee focused on transport aspects detailed in the draft London Plan, including the Sustainable Access Measure (SAM), industrial land, infrastructure requirements and car clubs. In this response, we focus our recommendations on these key topics.

In our review of the draft London Plan and following our evidence session on 8 September, we are assured of the close working relationship between the GLA and TfL in the development of the Plan – with TfL's impact evident across various measures. We heard from the Deputy Mayor for Transport that TfL has worked "to support the development of the London Plan to ensure that development, new housing and growth in this city is supported by high-quality and high-frequency public transport access."[2]

Yet, following our meeting we were left with concerns that the transport considerations in the draft London Plan are too heavily focused towards planning and development rather than on accelerating progress towards the targets set out in the Mayor's Transport Strategy. We heard repeatedly that a balance needs to be struck. And while it is right that London's spatial development strategy is focused on planning and this must be supported by sufficient transport access, TfL's primary focus

[1] Mayor of London, Draft London Plan consultation

[2] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p.1)

must be to ensure that any transport-related policies and considerations are in support of London's transport goals. We are concerned that the balance struck in the draft London Plan is too heavily weighted away from the fundamental transport aims. While the rest of this submission addresses four specific areas we consider warrant specific changes, we also believe there needs to be further work done to reconcile this fundamental challenge. We therefore invite TfL ahead of final publication of the London Plan to review the draft with a specific focus on meeting London's transport goals.

Sustainable Access Measure (SAM)

The Sustainable Access Measure (SAM) is a key new measure introduced in the draft London Plan to measure whole journey time to various destinations by public transport and walking. SAM is used in various policies in the draft London Plan, including the Optimisation Framework, industrial land policy and car parking, as well as to inform the calculation of housing targets.[3]

TfL previously used Public Transport Accessibility Levels (PTALs) which measure the time it takes to walk and wait for a mode of public transport and the service availability, to inform its service planning.[4] TfL's *The Sustainable Access Measure (SAM) Methodology Summary Report* makes clear that SAM is not replacing PTAL, but is fulfilling some of the functions formally performed by PTAL.[5]

The introduction of this new measure provided TfL with an opportunity to address the well-known issues with PTAL regarding the lack of accessibility metrics.[6] Indeed, we heard from Seb Dance, Deputy Mayor for Transport, that SAM "aims to improve on the deficiencies that we are well aware with PTAL."[7]

Yet, SAM fails to include accessibility metrics in its calculation. It also does not include cycling. TfL told us that adjusting SAM to include accessibility metrics and cycling is something it has "committed to do."[8] Lucinda Turner, Director of Spatial Planning at TfL, explained that TfL has a "programme of work on SAM to cover to look at things like accessibility and including cycling etc" but, she couldn't provide a timescale for when this work will take place.[9]

TfL's *The Sustainable Access Measure (SAM) Methodology Summary Report* says that cycling is not yet part of the measure "because at this stage it cannot necessarily be assumed as an option that the typical Londoner in all parts of the city can and will use" and that is "partly because in some areas of London, cycle infrastructure is poor quality, limited or missing altogether".[10] TfL has a target to increase the cycle network in London, though this is not restated within the London Plan, it was

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[3] TfL, The Sustainable Access Measure (SAM) Methodology Summary Report, July 2026 (p.26)

[4] London Datastore, TfL Public Transport Accessibility Levels

[5] TfL, The Sustainable Access Measure (SAM) Methodology Summary Report, July 2026 (p.26)

[6] London Assembly Transport Committee, Accessibility and inclusion in Transport Planning, February 2026 (p.28); see also Transport for All, Disabled people are excluded from London planning systems, November 2024

[7] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p.13)

[8] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p.10)

[9] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (pp.10 – 11)

[10] TfL, The Sustainable Access Measure (SAM) Methodology Summary Report, July 2026 (pp.9-10)

updated in the latest Vision Zero Action Plan 2. TfL has set a target for 70 per cent of Londoners to be living within 400 metres of the cycle network by 2041, with interim targets of 40 per cent of Londoners by 2030, and 55 per cent by 2035.[11] The latest update shows that 29 per cent of people now live within 400m of the cycle network.[12] This trajectory already gives TfL a rate of progress to plan for and track that could be used to inform a timescale for the SAM to include cycling, or locations where it could apply earlier.

There are different accessibility metrics that could be included in the SAM. TfL has already considered the future inclusion of step-free metrics, and has stated that it considers it likely that a step-free version of the SAM could build on existing work comparing the journey time differential between the full public transport network and the step-free only network.[13] TfL should explain what has delayed the addition of accessibility metrics to SAM. It is unacceptable that a new measure used to inform transport and planning decisions can continue to overlook accessibility, with no clear timescale for addressing these gaps.

We also have questions about how the measure was developed and whether Disabled People and their representative organisations were meaningfully involved in its design. We heard clearly through our work on accessibility and inclusion the importance of co-design. Co-design, a form of co-production, is a way of designing and delivering public services in an equal and reciprocal relationship between policy makers and individuals which results in shared strategic policy objectives and includes joint working to design and develop solutions to address inequality.[14] In our February 2026 report *Accessibility and Inclusion in Transport Planning* we recommended that TfL develops a new engagement policy that follows the co-production model.[15] We also heard evidence in support of a co-production approach in the design of new schemes in our more recent investigation into autonomous passenger vehicles.[16]

The Deputy Mayor spoke of the merits of co-design in our meeting on 8 September on the draft London Plan. He told us that "the work that the teams are doing, engaging with disability groups and ensuring that co-design is embedded from the very beginning, is so important."[17] Yet, when asked what engagement TfL had with Disabled People's organisations as part of the development of the SAM, we heard that TfL met with Transport for All last year. We then heard from Jack Maizels, London Plan and Planning Obligations Manager at TfL, that "we wanted to get the methodology note and all the information about SAM out in the public domain so we can start to get that feedback."[18] This is deeply concerning as it goes against the fundamental principles of co-design.

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[11] Transport for London, Delivering the Mayor's Transport Strategy 2025/6, June 2026 (p.20)

[12] Transport for London, Delivering the Mayor's Transport Strategy 2025/6, June 2026 (p.20)

[13] TfL, The Sustainable Access Measure (SAM) Methodology Summary Report, July 2026 (p.25)

[14] Local Government Association, Co-production, accessed August 2026; see also Department for Environment, Food & Rural Affairs, What we mean by "co-design", 11 December 2020

[15] London Assembly Transport Committee, Accessibility and inclusion in Transport Planning, February 2026 (p.45)

[16] London Assembly Transport Committee, Who's driving the future of autonomous transport in London, October 2026

[17] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p.10)

[18] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p.9)

Despite this Committee's previous recommendations and the Deputy Mayor's acknowledgement of the importance of co-design, there is no evidence of TfL using this approach in developing new policies. This has led to the creation of the new SAM, upon which the draft London Plan is based, that does not take into account accessibility considerations.

SAM draws on data from the London Travel Demand Survey (LTDS), TfL's annual survey which collects data on the way people travel.[19] As part of coproduction, and the addition of cycling to SAM, TfL should evaluate the current data that comes from the LTDS to SAM, and consider how it reflects different travel behaviours. There remain concerns about how bus-based journeys, care-related trips, journeys by disabled people, older people and families, and changing travel needs over a person's lifetime are reflected in SAM.

The Committee heard that TfL has not carried out an Equalities Impact Assessment (EqIA) on SAM because it is a "tool rather than a policy", which "does not directly drive investment decisions".[20] Lucinda Turner said TfL would take this away and we urge TfL to come back with some detail on this.[21] Further to the question of an EqIA, we would like to see more explanation of how SAM is expected to be used in practice, the relationship between data and travel behaviour, including a demonstration of how the use of SAM and the Optimisation Framework will support investment in local public transport services, including buses, and not solely prioritise strategic rail.

Recommendation 1: TfL must update the Sustainability Access Measure (SAM) to include accessibility metrics and cycling before the final publication of the London Plan, and further explain and examine the data behind SAM.[22]

Recommendation 2: When TfL is updating the Sustainability Access Measure (SAM) to include accessibility metrics, TfL must conduct this work using co-design with Disabled People's organisations, with the organisations being engaged from the start and throughout the process.

Industrial land

Freight operations require land and premises for logistics, with space for efficient storage and distribution. Both the current London Plan and TfL's 2019 *Freight and servicing action plan* have

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[19] TfL, The Sustainable Access Measure (SAM) Methodology Summary Report, July 2026 (p.11) see also TfL, Travel surveys, accessed 13 October 2026

[20] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p. 11)

[21] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p. 11)

[22] Elly Baker AM, Bassam Mahfouz AM, Joanne McCartney AM and Sem Moema AM are disappointed that the letter does not represent the depth and scope of concerns about the SAM, puts excessive emphasis on the desired inclusion of cycling and does not require through a recommendation that an EqIA must be carried out before the SAM is used, particularly before the inclusion of cycling. The response gives undue weight to TfL's inadequate explanation for not conducting an EqIA, despite previous Committee work indicating TfL's understanding of inclusion in planning is poor. This approach to scrutinising the SAM and the London Plan risks further de-prioritising the journeys made, and modes used, by people who already have fewer transport options, including working class Londoners, older and younger Londoners and women.

sought to preserve and enhance industrial land available in London.[23] Yet, we have heard evidence that the amount of industrial land space in London has shrunk by about 20 to 25 per cent since 2001.[24]

We heard from Lucinda Turner that a key difference in the new draft London Plan is that it identifies a targeted approach to the release of industrial land for housing.[25] This is set out in Policy PV5, which aims to "support housing delivery in industrial locations that are most suitable."[26] PV5 also sets out certain exclusion criteria, such as the land is required for infrastructure uses that rely on industrial land or is within clusters of designated industrial land with very good freight access.[27] We heard from Lucinda Turner that this protects bus garages, rail depots and waste infrastructure, and she said that the release of industrial land for housing "is really where you have that coincidence of good public transport connection, so it could be suitable for housing, but not-so-strong freight connections, so there is not a greater loss for moving freight."[28] But, Lucinda Turner also said there is a need to strike a "balance".[29]

In 2025 ahead of the publication of the draft London Plan, we heard evidence from the Road Haulage Association, Future City Logistics and Logistics UK that more needed to be done to include safeguarding of industrial land in the new London Plan.[30] It is of concern that the draft London Plan is softening the language around protections for industrial land, opening the door to further loss of this land, given its importance to freight operations. We remain unconvinced by the safeguards put in place via exclusion criteria since these are open to interpretation. Taken together, we see a very real risk that industrial land essential for the functioning of our city could be released for housing.

Recommendation 3: There should be stronger safeguards for industrial land in the final version of the London Plan, including strengthening the exclusion criteria for the release of industrial land to ensure there is no net loss of industrial logistics floor space. The safeguards should specifically protect land required for rail freight, river freight, freight consolidation and last-mile logistics operations.

Infrastructure requirements

The draft London Plan includes reference to major transport infrastructure projects to support the delivery of new homes. These include the West London Orbital, the Bakerloo line extension, Crossrail 2 and the devolution of rail services to TfL.[31] None of the schemes listed in the draft London Plan

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[23] Mayor of London, The London Plan 2021; see also TfL, Freight and servicing action plan, March 2019

[24] London Assembly Transport Committee, Transcript of Agenda Item 7 – Road Space, Driving and Congestion: Part Two – Panel 1, 23 November 2025

[25] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p.19)

[26] Mayor of London, Draft London Plan The Spatial Development Strategy for Greater London, 2026 (p.229)

[27] Mayor of London, Draft London Plan The Spatial Development Strategy for Greater London, 2026 (p.230)

[28] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p.20)

[29] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (pp.20-21)

[30] London Assembly Transport Committee, Transcript of Agenda Item 7 – Road Space, Driving and Congestion: Part Two – Panel 1, 23 November 2025

[31] Mayor of London, Draft London Plan The Spatial Development Strategy for Greater London, 2026 (pp.278-279)

are new, yet currently only one has funding support. The Docklands Light Railway (DLR) extension to Thamesmead received support from the Government in the 2025 Autumn Budget.[32]

The Government has estimated that London needs 88,000 new homes per year, amounting to 880,000 homes over ten years.[33] The draft London Plan sets a target to deliver 558,000 homes over the ten-year period up to 2037.[34] We heard from Lucinda Turner that the 558,000 target assumes existing transport plus the delivery of the DLR extension to Thamesmead and the devolution of the Great Northern Inners route to TfL.[35] Last November the Committee wrote to the Secretary of State for Transport in support of TfL's proposal for the devolution of Great Northern inner services.[36]

In June 2026 TfL launched a consultation on the DLR extension, supporting documentation for which stated: "Subject to a funding agreement with Government and the necessary permissions granted, construction could begin by 2029 with the extension and new stations at Beckton Riverside and Thamesmead potentially opening in the early 2030s."[37] So, even the transport infrastructure project that is the most advanced in terms of planning and funding is not deliverable until the early 2030s. Given the length of time it takes to deliver transport infrastructure, it seems unlikely that further projects will be delivered within the timescale of the draft London Plan unless more detailed costings, plans and funding agreements for these projects are brought forward imminently.

We heard from Lucinda Turner that:

> "[T]he biggest challenge is the funding and infrastructure needed to deliver the transport that we have identified. That is one of the key reasons we have not been able to meet the Government's housing target in the ten-year plan period, because we do not think it is deliverable unless and until we get the confidence that those public transport schemes will come forward."[38]

The need to grow capacity and the potential for overcrowding on existing lines, particularly if developments are targeted close to stations, must also be considered. This draft London Plan convincingly restates the vital need for further transport infrastructure upgrades in London. The Budget and Performance Committee recently explored some of the innovative approaches that could be taken to deliver these.[39] For this draft London Plan, we feel there needs to be a clear programme for works, with funding streams outlined, to deliver on the identified transport infrastructure deemed as necessary to support the delivery of new housing.

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[32] Mayor of London, ADD2837 DLR Thamesmead Extension: Social Infrastructure Study Budget Request, May 2026

[33] Mayor of London, Towards a new London Plan, 9 May

[34] Mayor of London, Draft London Plan The Spatial Development Strategy for Greater London, 2026 (p. 8)

[35] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p.24)

[36] London Assembly Transport Committee, TfL's rail devolution plans, 26 November 2025

[37] Transport for London, Extending the DLR to Beckton Riverside and Thamesmead

[38] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p.3)

[39] London Assembly Budget and Performance Committee, Euston we have a problem: Mind the funding gap, November 2025

Recommendation 4: TfL should establish a clear programme of works with indicative costs for the key transport infrastructure projects identified in the draft London Plan as necessary to deliver new homes, and should set out options for funding the works. Significant density assumptions should not be justified solely on the basis of future transport schemes where committed funding, delivery mechanisms and implementation timetables are absent, and the impact of new demand on existing services, including crowding, must be considered.

Car clubs

The Committee held an investigation on car clubs in 2025, during which we heard compelling evidence about the potential for car clubs to help those who are able to give up their private car. We also heard that car clubs can help support progress towards the Mayor's Transport Strategy target for 80 per cent of trips to be made by walking, cycling and public transport by 2041.[40] Yet, we found in our subsequent April 2025 report *TfL's Stalling Car Clubs* that London's car clubs were at risk of decline as a result of TfL stalling their progression in London.[41] This risk was realised in December last year, when Zipcar, London's largest car club operator, ceased its UK operations.[42]

As part of our car clubs investigation we heard from various stakeholders that statutory Mayoral documents, including the Mayor's Transport Strategy and the London Plan should be amended to include greater support for car clubs.[43] We heard from Andy Flood, Principal Transport Planner at Richmond and Wandsworth Councils, that phrasing "that is looking at a car club as a car rather than a service that enables people to get rid of a car or use cars less" should be reviewed.[44] The Committee made a recommendation in its 2025 report *TfL's Stalling Car Clubs* that:

> "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."[45]

The draft London Plan supports the provision of car clubs in developments only at SAM 4 and below, where they can support "car 'lite' development and be provided on street only."[46] We heard from Lucinda Turner that "we absolutely see a really important role for car clubs to boost connectivity and to provide alternative for Londoners who may not own a car, but who want to use one."[47] This does not recognise the important role that car clubs can play in enabling people to give up their private car. The draft London Plan could be stronger in its support for the provision for car club spaces, and in recognising the role car clubs can have in reducing private car use and contributing towards the Mayor's Transport Strategy targets. One specific way it could achieve this is

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[40] London Assembly Transport Committee, TfL's Stalling Car Clubs, April 2025

[41] London Assembly Transport Committee, TfL's Stalling Car Clubs, April 2025

[42] The Guardian, London has lost 'catastrophic' 89% of car club vehicles since Zipcar exit, July 2026

[43] London Assembly Transport Committee, TfL's Stalling Car Clubs, April 2025 (pp.14-15)

[44] London Assembly Transport Committee, Car Clubs – Panel 2, 22 January 2025 (p.16)

[45] London Assembly Transport Committee, TfL's Stalling Car Clubs, April 2025 (p.15)

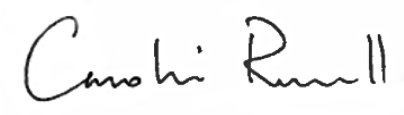
[46] Mayor of London, Draft London Plan The Spatial Development Strategy for Greater London, 2026 (p.203)

[47] London Assembly Transport Committee, Transcript of Agenda Item 7 – Question and Answer Session on the Draft London Plan, 8 September 2026 (p.31)

by explicitly recognising car clubs as shared mobility within its definition of sustainable transport, to encourage councils and developers to include provision for car clubs within their plans.

Recommendation 5: The Mayor should strengthen support for car clubs in the draft London Plan by recognising car clubs as shared mobility within its definition of sustainable transport and review the presumption that car club spaces be provided only on-street, allowing for provision within developments where this would be publicly available, improve accessibility and reduce private car ownership.

Yours sincerely,



Caroline Russell AM
Chair of the Transport Committee