MDA No.: 1913

Title: Draft London Plan

1. Executive Summary

1.1 At the Environment Committee meeting on 3 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: Gareth Roberts AM, Chair of the Environment 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 Environment 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 Environment 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:

- Leonie Cooper AM (Deputy Chair);
- Thomas Turrell AM;
- Zack Polanski 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: *Richard Clarke*

Printed Name: Richard Clarke

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

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Gareth Roberts AM
Chair of the Environment Committee

Rt. Hon. Lord Sadiq Khan of Tooting
Mayor of London
Greater London Authority
(Sent by email)

15 October 2026

Dear Lord Khan,

Re: Draft London Plan consultation

I'm writing to share the Environment Committee's response to the draft London Plan consultation.[1] The Committee held a meeting on the 3 September 2026, where we spoke to your Deputy Mayor for Planning, Regeneration and the Fire Service, Jules Pipe CBE, as well as GLA officers and representatives from the London Wildlife Trust and CPRE London.[2] We are grateful for their participation and answers to our questions.

Our scrutiny and response has drawn on discussions in this meeting as well as wider London Assembly meetings on the topic, and a range of investigations that the Committee has held over this Assembly term.[3] It builds on our response to 'Towards a new London Plan' consultation in June 2025.[4] It also draws on contributions to the Committee's 'environmental stocktake' meeting in February 2026, which invited stakeholders from across the capital to discuss progress on London's environmental priorities.[5]

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[1] Mayor of London Draft London Plan consultation July 2026

[2] Environment Committee Agenda for meeting on Thursday 3 September 2026, 10.00 am

[3] This includes food growing, London's net zero target, water and rivers, trees, parks, access to green space, and heat networks in London. See: London Assembly Environment Committee Recent work

[4] London Assembly Environment Committee Letter in response to Towards a new London Plan consultation June 2025

[5] London Assembly Environment Committee Progress on priorities: London's Environmental temperature check February 2026

The London Plan is a vital document for shaping London's development over the next decade and beyond. The Committee welcome your ambition for the draft London Plan to "build a fairer, greener London for everyone".[6] We recognise the multiple challenges that London faces, and it is vital that these are tackled together and that London's environmental sustainability is part of an integrated approach.

In this response, we highlight five areas which we have concerns around and would like to be strengthened in the final plan. These include details of green belt and Metropolitan Open Land policy, the removal of food growing policy G8 and the details of policies on biodiversity net gain, datacentres, and energy efficiency.

1. Changes to protections for Green belt and Metropolitan Open Land

A key concern for this Committee is that the London Plan protects and enhances the capital's natural environment. Recent Government changes to the National Planning Policy Framework (NPPF) have weakened previous protections for green belt and create the potential for development on 'grey belt' land.[7] We have therefore considered how the London Plan is responding to this new national planning context.

Metropolitan Open Land

Around 10 per cent of London is designated as Metropolitan Open Land (MOL).[8] This designation has long provided equivalent protection as green belt for a strategic green chain of sites across the capital. With changes in the national policy on green belt, the Deputy Mayor confirmed to us that MOL will now have distinct protections, with "no change" to the protection planned.[9]

However, we note that policy PV6 does include new criteria to define 'exceptional circumstances' for releasing MOL in local plans, which include if the land is "not publicly accessible due to physical, charging, or member-only restrictions".[10] The accompanying guidance suggests this may include sites that are "wholly inaccessible to the general public other than through paid access or membership, unless such fees are nominal".[11]

While we welcome the ambition to improve public access to green spaces, we have some concerns about how these new 'exceptional circumstances' will be applied in practice, particularly around the risk of unintended consequences. These could include creating additional uncertainty for local membership organisations around their long-term futures, or incentives for landowners to remove existing informal access to sites to try to justify future development. We welcome that the guidance makes it clear that any releases of recreational land require an assessment against wider policies,[12] and that opportunities to improve public access and quality without MOL release should be

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[6] Mayor of London Draft London Plan 2026 p1

[7] UK Government National Planning Policy Framework August 2026 pp59-64

[8] GIGL Mapping London's Green Belt and Metropolitan Open Land

[9] London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 1, p13

[10] Mayor of London Draft London Plan 2026 PVC62, pp 232-233. Also, paras 6.42 and 6.44, pp234-5

[11] Mayor of London Draft London Plan 2026 para 6.44 pp234-5

[12] Mayor of London Draft London Plan 2026 para 6.44 p234

prioritised.[13] This provides us with some reassurance that any changes must be justified, but we are concerned the approach still potentially opens up an area of uncertainty for local groups using MOL. Additional guidance, including lessons learned from examples of where increased access to previously restricted land has been successfully achieved may be helpful to share.

Recommendation 1: The Mayor should review Metropolitan Open Land policy (PV6C2) and add further guidance to ensure that new 'exceptional circumstances' criteria for MOL release in local plans around public access do not lead to unintended impacts for membership organisations or areas of MOL with existing informal access.

Green belt

The Committee has repeatedly heard concerns about national changes to green belt policy, including at its Environmental Stocktake event in February.[14] London Plan policy PV7 – 'Sustainable development and enhancement of the Green Belt' - seeks to take a strategic approach to restrict development to higher density development around the most appropriate sites at a scale where comprehensive master planning could be applied, such as well-connected railway stations, and ensure environmental improvements.[15] Committee Members have a range of views on this, with the majority supportive of the aim to restrict development to the most appropriate strategic sites given the updates to national policy.[16] However, areas of concern include:

- **Whether brownfield sites will be developed first in practice.** While the draft London Plan adopts a 'brownfield-first' sequence to identifying potential sites, the Deputy Mayor told us there are no guarantees that this is the order that development will take place in practice.[17] Instead he told us that the intention is that the requirement to provide a greater proportion of affordable homes in green belt developments, alongside the master planning and infrastructure required – including accessible green space -- would mean that many of these green belt sites would take some time to be completed.[18] It will be important that the GLA keep this under review to ensure brownfield sites are in fact enabled and prioritised.

- **Concerns around the details of the Broad Locations for Growth (BLGs), and particularly the risks of 'fundamental impacts' on the green belt.** The draft London Plan identifies ten Broad Locations for Growth (BLG) in London's green belt, which are

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[13] Mayor of London Draft London Plan 2026 para 6.42 p234

[14] This involved roundtable discussions with stakeholders, which were then fed back to the Committee. One summarisers told the Committee "we talked a lot about… the threat of expansion of development into Green Belt land." London Assembly Environment Committee Transcript of meeting on 3 February 2026 at 12:15pm

[15] Mayor of London Draft London Plan 2026 Policy PV7, p235

[16] Thomas Turell AM [Conservative] and Andrew Boff AM [Conservative] wish to place on record their dissent from the majority view expressed here. They oppose all building on the Green Belt.

[17] London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 1, p9-10

[18] Jules Pipe CBE: "We are not assuming anything in the first four years from Green Belt, from BLGs, because of the work required master planning them and the barriers, which include the tariff, effectively, that they would incur in providing the infrastructure and the amount of affordable housing that would be required" London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 1, p11-12

prioritised for development due to proximity to a "well connected" station. This decision means many BLGs include areas of strongly performing green belt, in addition to land assessed to be 'grey belt', which could be in scope for development. The green belt assessments found that five per cent of land identified as BLG was at likely risk of fundamental impacts, with a further 28 per cent identified as having some potential risk.[19] This is a significant shift in approach. John Diver, Principal Strategic Planner at the GLA, also told us that master planning "needs to be developed at the local level,"[20] including an ongoing two-way exchange between all stakeholders, to identify how specific sites are taken forward. This should also include removing areas if BLGs are shown to not be appropriate in practice.

- **More detail is needed about how to secure environmental improvements in the green belt.** The draft London Plan includes a focus on environmental improvements in the green belt in policy PV7C. It also includes references to the Local Nature Recovery Strategy (LNRS) and potential environment opportunity areas.[21] We welcome this. However, we heard concerns from Richard Barnes of the London Wildlife Trust that while the intention of the policy is positive, it is not sufficiently detailed about how this will be delivered in practice. [22] The Wildlife Trusts has developed the concept of a 'wildbelt' planning designation concept.[23] Richard Barnes told us that this could provide a blueprint to protect green belt land for nature recovery.[24] The GLA should consider this and provide more detailed guidance about what is expected in practice.

Recommendation 2: The London Plan section PV7 should provide additional detail – either through further explanation in the guidance section of the plan or supplementary planning guidance -- to ensure that biodiversity and access improvements to green space in the green belt are secured long-term.

2. Implementation of biodiversity and greening improvements

The Committee has long supported efforts to promote tree planting, biodiversity improvements and urban greening in London. Policies GHR6 and GHR7 in the draft London Plan – covering Biodiversity Net Gain (BNG) and the Urban Greening Factor (UGF) - are important to ensure new developments help improve the natural environment overall. We welcome these policies, including the focus on ensuring tree planting decisions consider the impacts of climate change, [25] something we explored with experts from RHS Kew in our meeting and visit last year.[26] However, we feel the following areas of policy would benefit from need additional detail:

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[19] Mayor of London, London Plan Green Belt Strategic Approach para 4.98, p88

[20] London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 1, p9.

[21] Mayor of London, Draft London Plan 2026 PV7C, p236, and para 6.49, p242; para 6.55, p243

[22] Richard Barnes: "There is a definition in the glossary of what EOAs are, but that does not define how that is, and they are not included in policy." London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 3 p3

[23] The Wildlife Trusts Wildbelt briefing

[24] London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 3 p4-5

[25] Mayor of London, Draft London Plan 2026 GHR6B, p180

[26] Environment Committee writes to Mayor about managing London's trees for a changing climate July 2025

- **Ensuring biodiversity improvements are local**. The national policy on biodiversity net gain allows developers to contribute towards off-site improvements, if it is shown that on-site improvements aren't possible.[27] The draft London Plan goes further than this with Part E of policy GHR6 stating that "provision within London should be prioritised".[28] Since the impacts of development will be felt locally, we feel any biodiversity improvements that cannot be provided on-site should be local wherever possible. We would also welcome a commitment that the GLA will develop a process to monitor how this is implemented in practice.

- **Mitigating recreation pressure on nearby habitats.** The Committee also heard from London Wildlife Trust that there needs to be further guidance about managing recreation pressure on nearby green sites. Richard Barnes gave the example of a new development that would be connected to a sensitive environmental habitat by a new bridge, and intended to use that space as the provision of recreation for the development, without any mitigation.[29] He told the Committee that while paragraph 5.68 of GHR6 includes "noise, shading or lighting" as examples of potential impacts,[30] it "does not talk about the impact of recreational pressure."[31]

Recommendation 3: Policy GHR6E should include stronger language to support local provision of any biodiversity improvements that cannot be provided on-site, such as stating 'provision within London, preferably locally, should be prioritised'. A review of how this is being implemented in practice should be undertaken within 2 years.

Recommendation 4: Policy GHR6 should incorporate "recreational pressure" as a factor to be mitigated on adjacent sites in paragraph 5.68.

3. Food Growing

The importance of food growing, for biodiversity, community wellbeing, food security and resilience was an issue that the Committee explored in its 'London: A Growing City' report. We called for the current Plan's policy G8 to be strengthened.[32]

In your draft Plan, this standalone policy has been removed, with only limited references to food growing now left scattered around other policies. While Sophie Donaldson, London Plan Manager at the GLA, told us that "The policy intent is still there. We have just shifted it into a slightly different place where it can have hopefully more impact",[33] we are not convinced. Although there are some

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[27] UK Government Understanding biodiversity net gain July 2026

[28] Mayor of London Draft London Plan 2026 GHR6E, p181

[29] London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 3, p4

[30] Mayor of London, Draft London Plan 2026 p183

[31] London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 3, p2

[32] London Assembly Environment Committee London: A growing city? April 2025

[33] London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 2, p8

references to some dimensions that relate to food growing within the London Plan and NPPF,[34] these appear weaker, and do not give the right signal around food security and protection for community food growing sites across the capital.

The revised NPPF sets out as part of policy HC1 (Planning for Local Communities) that development plans should set local standards for recreational land and facilities, which includes allotments.[35] It also mentions "allotments and community food production" as a beneficial use of the green belt,[36] and the "provision of community orchards" in suitable locations as part of new developments.[37]

We are concerned that as the legal obligation to provide allotments doesn't apply to inner London,[38] further signals from the London Plan to protect and expand opportunities for food growing are needed. Given the progress in this area in many parts of London in the past decade and more, such as the Right to Grow movement,[39] the removal of this policy risks undermining the good work that is being undertaken.

Recommendation 5: Current London Plan policy G8 should be retained and strengthened in the new London Plan.

4. Data centres

There are currently 99 operational data centres in London,[40] and this is expected to expand further to meet the needs of cloud computing and artificial intelligence (AI). [41] However, there are widespread concerns about their potential environmental impacts. In our recent environmental stocktake event in February 2026, Oliver Hayes from Global Action Plan told us about how they can consume significant levels of resources, including energy and water use, as well as potentially having air quality and urban heat effects.[42] As the Planning and Regeneration Committee has explored, high energy usage potentially impacts the amount of energy available for new housing, [43] as well as pushing up the cost of decarbonising other areas, such as the transition to electric vehicles and heating.

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[34] Food growing appears to be mentioned just twice in the draft London Plan, once under activities that characterise Metropolitan Open Land (para 6.45, p233), and also as something that housing developments should provide in communal amenity areas, 'where appropriate' (HN8 C5 p107). Allotments are also mentioned as one appropriate use that enhances Metropolitan Open Land (PV6 G3). Mayor of London Draft London Plan 2026

[35] Ministry of Housing, Communities and Local Government National Planning Policy Framework August 2026, HC1d, p74

[36] Ministry of Housing, Communities and Local Government National Planning Policy Framework August 2026, p61

[37] Ministry of Housing, Communities and Local Government National Planning Policy Framework August 2026 N3 1a, p90

[38] The London Government Act 1963 (para 55) removed the statutory requirement for inner London boroughs to provide allotments, which is set out in the Small Holdings and Allotments Act 1908.

[39] Incredible Edible Right to grow

[40] Buro Happold for GLA, London's Data Centre Future Growth Forecasts and Strategic Insights December 2025, p3

[41] UK Parliament POST What are data centres and how sustainable are they? POST note 762 16 March 2026

[42] London Assembly Environment Committee Transcript of meeting on 3 February 2026 at 12.15pm. pp14-17

[43] London Assembly Planning and Regeneration Committee Gridlocked: how planning can ease London's electricity constraints December 2025

Given these concerns, the inclusion of a data centre policy (GLE3) in the London Plan is therefore welcome. As we explored in our recent heat networks investigation, there are opportunities for re-using heat from datacentres for housing, and so we are pleased that heat recovery opportunities are recognised in the plan wherever possible.[44]

However, while policy GLE3 requires that proposals demonstrate "electricity and water efficiency measures including innovative cooling technologies,",[45] there are no benchmarks provided to define these, and the policy shows a concerning lack of detail. The Deputy Mayor provided some assurance in the London Assembly plenary meeting that there is the intention to provide additional guidance on this, including "some statement of intent within the next six months".[46] This cannot come soon enough, and detailed guidance needs to be prioritised urgently.

Recommendation 6: The GLA should prioritise determining appropriate environmental limits for datacentres and publish additional supplementary planning guidance setting out detailed benchmarks, standards and monitoring.

5. Energy efficient design for heating and cooling

Energy efficiency standards for buildings are an important way of ensuring that London builds homes that are affordable to keep at comfortable temperatures year-round. The draft London Plan includes policies (including MBUL6 and GHR4) for ensure buildings are suitable for hot weather with the expectation that awnings and shutters are included in building design.[47] We welcome this recognition that buildings need to be designed for efficient cooling as well as heating.

For many years London has set tighter energy efficiency standards than the rest of the country to reduce energy use, carbon emissions and bills. GLA officers clarified to us that the updated National Planning Policy Framework (NPPF) published in August allows the London Plan to set tighter energy efficiency standards in London – which had been uncertain at the time that the draft plan was published.[48] We were told by Rhian Williams, Senior Strategic Planner at the GLA, that more work will now need to be done to ensure that the measures used in the London Plan are consistent with the Future Homes Standard and are straightforward for applicants and planners to use.[49]

There is therefore still some uncertainty around the final metrics that will be applied. However, the focus in GHR1 in improving thermal efficiency to minimise energy consumption and occupier bills is welcome.

We also support the intention to monitor post-occupation energy usage to ensure that these are effective. In the Committee's investigation into heat networks we heard about the importance of not

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[44] London Assembly Environment Committee Zoning: The Heat Networks Puzzle June 2026

[45] Mayor of London Draft London Plan 2026 p131

[46] London Assembly Transcript of Plenary Meeting on 10 September 2026 at 10am, p31

[47] Mayor of London Draft London Plan 2026 MBUL6 (para 2.85, p57) and GHR4 (para 5.42, p174)

[48] London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 1, p4

[49] London Assembly Environment Committee Transcript of meeting on 3 September 2026 at 10am Panel 1, p14-15

only ensuring designs are technically efficient but ensuring that residents know how to use them. [50] As well as monitoring post-occupation energy usage, there should be a requirement to ensure that ways to save energy and maintain comfortable temperatures are communicated simply to residents and should be designed to be as intuitive and flexible as possible.

Given that the Government have now launched plug-in solar, such installations should be considered as part of post-occupation monitoring where relevant.[51]

Recommendation 7: The London Plan should include guidance for developers and building managers to communicate clearly with residents about how to maximise the operational energy efficiency of buildings. Future post-occupation energy monitoring should review both the effectiveness of the technical thermal efficiency standards but also how buildings are used in practice, including any post-occupation installations such as plug-in solar panels.

Yours,



Gareth Roberts AM
Chair of the Environment Committee

[50] London Assembly Environment Committee Zoning: The Heat Networks Puzzle p24

[51] Department for Energy Security and Net Zero Households can save as plug-in solar panels come to market, 26 August 2026