



## Draft London Plan 2026

### Response from the London Forum of Amenity and Civic Societies

#### Chapter 1. Overview and Good Growth Objectives

1. We acknowledge that the Draft Plan is in large part an exercise in damage limitation, in response to the Government's totally unrealistic target - unrelated to any assessment of need - that 85,000 new homes should be built in London each year<sup>1</sup>. In failing to meet that target, and in some other respects, the Draft Plan does not meet the requirements of the NPPF. It seeks to show that 55,800 new homes per year is the maximum realistically achievable over the ten years up to 2037, with targets for each London borough set in accordance with their presumed capacity to meet that overall number. We agree strongly on the need for a reduced target. But the Draft shows that even the 55,800 target depends on high levels of housing developments in Brownfield First Opportunity Areas (BFOAs) and in other Broad Locations for Growth (BLGs), including some in the Green Belt. Large housing developments in most of these locations will depend - as noted for several BFOAs listed in Annex E - on delivery of transport and other investments to enhance connectivity. Such investments go far beyond the enhancements listed in para 1.16, for none of which has investment been committed; and for some there is no realistic prospect of that changing over the period of the Draft Plan.
2. The Draft Plan acknowledges (para 1.19) that its ten-year housing targets cannot be met without significant risk to London's transport system, to its environment, to its basic infrastructure of services, to the health and well-being of those who live and work in London, and to the needs of business and industry for land to be used for other purposes. Delivering the housing targets will therefore be a major challenge.
3. We believe that the ten-year target of 558k net additional homes is unlikely to be met. We also believe, however, that the evidence to support that target - ONS and GLA population projections, the assessment of housing need in the Strategic Housing Market Assessment (SHMA) and its Addendum, the Strategic Housing Land Availability Assessment (SHLAA) and the Viability Assessment - is seriously flawed. We analyse those key documents in our Appendix A below, where we show that they do not provide a sound basis for the housing target or for its key components relating to housing mix by tenure and by size. Nor does it provide a sound basis for the key

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<sup>1</sup> The Standard Method does not provide an assessment of *need*: rather, it produces a housing *target* based on a formula using a) existing stock, and b) an assessment of affordability based on earnings data that the ONS admits is unreliable and is not even related to resident location. Neither of these factors even attempts to measure housing need; they are at best very approximate proxies. Any claim that the Standard Method assesses housing need is straightforwardly false.

policies set out in the Draft Plan, especially those in Chapters 2 and 3. We make use of the analysis in Appendix A in our comments on those policies.

4. Notwithstanding that very strong caveat, we **welcome** the Mayor's ambitions for good growth, and the Objectives set out in Table 1.1.
5. *We are disturbed, however, to find that nowhere in the Draft Plan itself, other than in Annex F, is there any reference to the infrastructure of public services. In this respect the Draft Plan is not compliant with the NPPF Policy HC1. And even Annex F does not meet the definition of public service infrastructure in the NPPF, since it excludes social care. Nor is there any mention of public service infrastructure in the London Infrastructure Framework published in March 2026. This huge omission must be addressed before the Draft Plan is submitted to the Examination Panel.*

## Chapter 2. Making Best Use of Land

### MBUL1 Spatial Strategy

6. We have stated above that we believe that the 558k target for new homes is not feasible and that it would, if implemented, have unacceptable consequences. Setting that critical overarching issue aside, however, we **support** the general thrust of this policy, and in particular its emphasis on the need for increased transport infrastructure and connectivity. We are concerned, however, that the ambitions for Broad Locations for Growth (BLGs) and Environmental Opportunity Areas (EOAs) stated initially in paragraph 2.2 will not be achieved by policies in the rest of the Draft Plan and will not meet the requirements set out in Sections 2, 4, 5, 7, 13 and elsewhere in the 2026 NPPF. Nor will they support those BLGs and BFOAs with deliverable transport, utilities, education, healthcare, nature recovery, climate resilience, public access, recreation, community and green infrastructure, and planning resources with credible funding, phasing and delivery mechanisms.
7. We recognise the pressures that have led to the proposals to build on the Green Belt. But it is most unfortunate that the delays in establishing strategic planning authorities beyond London mean that it has not been possible to cooperate with them in establishing where new housing and commercial developments, including sites for industrial and logistics purposes, should most appropriately be located. We note that the surrounding strategic planning authorities - once they are in place - will also face their own considerable challenges in meeting their housing and other targets.
8. *Our key concern is that the policy risks failing the soundness test set in the NPPF unless it is amended to require a clear evidenced approach demonstrating that brownfield and under-utilised land, opportunities for intensification and other alternatives have been fully considered before any Green Belt development is considered, in line with NPPF Policy GB3.*
9. *We also **object** to the omission of any reference of the kind included in successive previous London Plans - and which would be consonant with the 2026 NPPF - to focusing housing developments within 800 metres of a station or a town centre. We **propose** that a new clause should be added to the policy to encourage intensification of development within 800 metres walking distance of railway stations and town centres.*

10. **We have strong reservations** about Clause A.5 and its suggestion that the priority given to affordable housing should allow for exceptions in early scheme phases in relation to housing mix and delivery. This provision is worsened by the further suggestion in para 2.17 that early phases of Purpose-Built Student Accommodation (PBSA) and Large-Scale Purpose-Built Shared Living accommodation (LSPBSL) should be allowed to proceed without their applicable affordable housing requirements in order to build scheme value and deliverability. The evidence shows that these exceptions are both unnecessary and unwarranted. The overriding priority, without exception, should be for affordable housing, as we explain in our Appendix A and in our responses in Chapter 3. *We propose, therefore, that Clause A.5 should be deleted.*

11. A **further key reservation** is that once again no attempt has been made either here or in other policies such as GHR9 to plan effectively to protect and enhance London's central spatial asset, the River Thames. The absence of any effective policies for the Thames Policy Areas has meant that essentially unplanned development has predominated on both banks of the river over the past two decades. This has led to irrevocable harm to the settings of the river itself, and of listed buildings, parks and gardens, and other heritage assets. The failure over many years to develop and implement a vision-based approach to protect and enhance areas along the banks of the Thames as London's central character asset must be remedied as a matter of urgency. Moreover, there is an unprecedented opportunity to realise such an approach now that the vast majority of both the north and south banks of the river east of Tower Bridge are designated as growth areas. This opportunity must not be missed. *We therefore propose that the Thames should be explicitly recognised as a strategic element in London's Spatial Strategy, setting policies for the nature, scale, height and location of development in Thames Policy Areas; and managing the impact of developments on strategic and local views not only in the Central Activities Zone (CAZ) but west of Lambeth Bridge and east of Tower Bridge. A map should be added to the Draft Plan to show the Thames Policy Areas, as in Figure 9.7 of the current Plan, and the term should be explained in the Glossary. This will have implications for Policies MBUL3 and PV8.*

12. Figure 2.2 for the Indicative 20 Year key diagram has sixteen Future Candidates as Broad Locations for Growth (BLGs), in addition to those shown in Figure 2.1. *There should be a link to work done to identify and propose those additional BLGs and the likely timescales for them so that new Local Plans can have relevant policies.*

## **MBUL2 Optimising Land Use**

13. Again, **we support the general thrust of this policy**, and the decision to set in the Optimisation Framework minimum densities higher than those set in the NPPF. But we have reservations as to specific aspects of the Policy and the Framework. *The problems outlined below must be remedied as a matter of urgency.*

14. First, we have concerns about how the matrix in the Optimisation Framework (Table 2.1) is currently presented, and how readily understandable it is. *We propose that it should be road-tested with potential users.*

- a. Our experience is that many sites do not currently conform to the parameters and set out in Box MBUL2

- b. The use of habitable rooms per hectare as a density measure is understandable as a check against incentives to provide small units. But when the primary measure for housing delivery is dwellings per hectare, it is not clear why the Framework has not followed Policy D3 D in the current London Plan by making use of both measures. We **welcome** the reference (in paragraphs 2.24-2.25) that the density range refers to *net* residential density; **but we propose that the Optimisation Framework itself should make use of both dwellings and habitable rooms per hectare, and that in both cases it should refer to net density.**
  - c. The context settings which are explained only in outline below a small and essentially unreadable London Context Map (Figure 2.5) three pages later. No reference is provided as to where and how the map can be explored further on the London Datastore.
  - d. The brief explanations of Sustainable Access Measure (SAM) at the foot of Figure 2.4 and in paragraph 2.40 are inadequate; and we are aware of some suggestions that the SAM mapping may include some transport improvements that have not yet been implemented or committed, let alone funded. **There should be at least**
    - i. a footnote on page 30 to provide more information about SAM, and the methodology and data on which it is based
    - ii. a link to a map which can be used to identify and interrogate the use of SAM in individual locations, alongside the PTAL measure, and
    - iii. a Glossary entry for SAM which refers to the detailed report on SAM listed in the Evidence for Chapter 2; and explains how it differs from the PTAL measure, and how the two measures will be used in complementary fashion<sup>2</sup>.
15. Second, Box MBUL2 assumes that parameters have been set by planning authorities in accordance with the proposed approach, using design codes, masterplans, site allocations etc. That may well be true in the future, but only as new local plans are produced over the coming years. It is certainly not true at present, especially for many current Opportunity Areas (OAs), more than half of which have Opportunity Area Planning Frameworks (OAPFs) that are more than 10 years old and have not been reviewed, and which do not include ‘relevant density, height or other capacity guidance’. The descriptions in Annex E indicate that a high proportion of BFOAs depend on as yet uncommitted transport projects. Nothing is indicated about whether, and if so how, the current OAPFs are to be updated, or whether and if so how, their connectivity is to be improved. **That needs to be explained.**
16. Third, we have **strong reservations about the use of the SAM for large sites which may take ten or twenty years to build out, and where transport improvements will be necessary to make the site feasible and accessible.**
17. Fourth, we are concerned by the imbalance in the treatment of the height and density ranges in the Framework. The development management policy in Clause C makes clear that failure to meet the minimum heights and densities set in the Framework

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<sup>2</sup> See *The Sustainable Access Measure (SAM): Methodology Summary Report*, passim

should be given very significant weight in planning decisions. But the text at the end of Table 2.1 suggests that it may be acceptable in some cases to exceed the maximum heights and densities it shows. Developments that exceed the density and height range are not even required to be exceptional. *We believe that it is **essential** to be clear about the maximum as well as the minimum densities that will be allowed.*

18. Fifth, it is acknowledged in para 2.29 that the London Context Map provides a high-level description and characterisation of London's built-up areas, and that it does not address issues of sensitivity to new developments. It is further acknowledged (para 2.26) that the appropriate density and height should be informed by how sensitive each area is to change. In this context, we propose that:

- a. *Clause A.2 should be **strengthened** so that at the very least it strongly encourages boroughs to undertake and regularly review character studies of their built-up areas, and their sensitivity to change.*
- b. *There should be **explicit references** both in the Policy MBUL2 itself and in the Optimisation Framework to the issue of sensitivity, heritage assets, and more specifically to listed buildings, parks and gardens, and to conservation areas.*
- c. *We note also the reference in para 2.32 to walkability and other issues, which we believe should be addressed in the Optimisation Framework.*

19. Sixth, while we **welcome** the draft *London Small Sites Design Code* now published for separate consultation, we believe that the policy is unclear as to its status. Clause A.3 states that any local design guides – including those already existing – ‘should not deviate from the overall scale and ambition set out’ in the Code. Moreover, para 2.34 states that the code ‘will apply in line with this policy’ and that it ‘will set a number of design requirements’. But the draft is now presented as London Plan Guidance which does not have the statutory status associated with the London Plan itself. *The status of the Code should be **clarified**, especially since the Draft Plan also envisages (para 2.37) that boroughs may develop their own small site design codes.*

20. Seventh, we regret that the requirements of Policy D10 in the current London Plan on basement developments have not been included anywhere in the Draft Plan. There is no equivalent policy in the NPPF, and we believe that there is a need for policies that provide protection for neighbours against the risks involved in what has become a common problem across London. *An equivalent of Policy D10 in the current Plan should be **included** in Chapter 2.*

21. Eighth, we regret that in a policy designed to optimise land use, there are no strong measures to promote land assembly across all parts of London, not only Opportunity Areas (covered in Policy PV1). There are too many examples across London of allocated sites where development has been stalled for decades by the complexities associated with multiple landowners. Problems with land assembly have also led to tall buildings being developed on small sections of larger sites, rather than the mid-rise buildings that would have been appropriate across the whole site. *Land assembly is often the problem that militates against the mid-rise developments the Draft Plan wishes to promote, and we **propose** that it should be addressed in the Plan.*

22. Finally, *we **propose** that either this or some other policy in the Draft Plan should include measures to meet the requirements of NPPF Policy P1 to address pollution,*

contamination, and ground conditions in the selection of sites, and to identify zones where restrictions may be necessary on certain types of development.

### MBUL3 Tall Buildings

23. This policy needs to be set in the context of the hundreds of tall buildings - 199 of over 100 metres as recorded in the *Metropolitan Tall Buildings Study*<sup>3</sup> - for which consent has been granted, but which have not yet been built. The Draft Plan clearly envisages that a significant proportion of those consented buildings will be erected in the next ten years, and that more will be added to them. Many more parts of London - such as West Ham, Lewisham and North Acton - will be characterised by clusters of very tall buildings, with the risk of isolated ones in other locations.

24. We have some reservations about the designation of 17 locations where 'metropolitan' tall buildings of 100 metres or more 'may be appropriate'. It is unclear whether the locations have been assessed at borough level. There is also a tension between terminology such as 'may be appropriate' and a requirement for boroughs to incorporate the locations - albeit with precise boundaries as defined by them - in their Local Plans. We have concerns that the Draft Plan envisages that metropolitan tall buildings will become a prominent feature of the townscape in many locations well beyond the well-established clusters in the Central Activities Zone (CAZ) and other areas such as Croydon. We also consider that the three tiers of metropolitan tall building clusters as defined in para 2.46 are unclear and need to be reconsidered. *At the most basic level, the policy lacks any explanation as to the benefits the clusters are intended to bring either to the locality or to London as a whole.*

25. We have two further major concerns. First, the policy fails to resolve the widespread disquiet about the consequences of the so-called Master Brewer judgment. Rather, it entrenches those consequences. In the Development Management Clause A.3, as well as Box MBUL3, the policy clearly envisages that tall and very tall buildings will be built outside the 17 locations for metropolitan tall buildings in the Draft Plan or any locations specified in local plans for tall buildings of lower height (Plan-Making Clauses A.2 and A.3). Borough planners might well in these circumstances consider seriously whether it is worth their while to identify in local plans any locations for tall (especially very tall) buildings when such buildings might be built anywhere in the borough. Developers will continue to propose tall buildings wherever they please, in specified locations or elsewhere. To make things worse, Clause B allows, albeit with some restrictions, the possibility of isolated tall buildings. *The policy thus risks rendering essentially pointless any locations for tall buildings to be specified in local plans. Overall, therefore, we believe that key aspects of this policy will be unacceptable to our local communities. We propose that Development Management Policies A.3 and B should be deleted, along with all but the first sentence of clause 2 of Box MBUL3, and all after "Part A (1)" in para 2.48.*

26. Our second key concern is that there is no mention in the policy or the surrounding text of the **Thames Policy Areas** covered by policy GHR9 Plan-making A.2. As we have noted in our comments on Policy MBUL1 the Thames has proved to be a magnet for

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<sup>3</sup> New London Architecture (NLA) estimates that nearly 600 buildings of 20 storeys or more have received consent, which at the rate of development over the past 15 years would represent a 20-year supply.

developers of tall buildings over the past two decades, and views along the river have been seriously and irrevocably damaged. Areas between Tower Bridge and Lambeth Bridge have some limited protection from the London View Management Framework's thirteen river prospect views. Beyond those areas, however, particularly to the west of Lambeth Bridge, there is no such protection. *There is an urgent need for measures to ensure that the Thames Policy Area as a whole is protected from inappropriate developments of tall buildings, and that Mayoral scrutiny of proposed tall buildings is used for that purpose (see our recommendations under MBUL1). We propose that MBUL3 Development Management Policy A4 should be amended to cover buildings over 20 metres near the Thames, with A4 vi strengthened to refer to the Thames Policy Area: "proposals for buildings over 20 metres high near the River Thames, and particularly within the Thames Policy Area, should be accepted only in the most exceptional circumstances, and only if they protect and enhance the open quality of the river and the riverside public realm".*

#### **MBUL4 Utilities**

27. We **support** this policy, *but we propose that the need for plan-makers to engage positively with relevant providers (para 2.61) should be foregrounded in the policy itself. Such engagement is especially important in dealing with the difficulties outlined in para 2.67 in achieving compatibility between necessary improvements in utilities infrastructure and place-based or heritage sensitivities.*

28. We note that some recent Government proposals may have an impact on this policy. The MHCLG consultation of 24 August 2026 on 'Planning Powers for Mayors in England' includes proposals to remove the restriction that Local Development Orders (LDOs) cannot be used to grant planning permission for development affecting listed buildings. It also implies that the Mayor should be involved in certain large-scale infrastructure developments. *These proposed changes should be covered if necessary by the promised implementation guidance or by amendments to the Draft Plan.*

#### **MBUL5 Sustainable Transport**

29. *The Mayor's Transport Strategy dates from 2018, and it is in urgent need of review.* This is particularly unfortunate since the Draft Plan depends critically on the need for transport interventions to produce a major change in connectivity, especially for BFOAs as identified on Policy PV1 and in Annex E, many of which are heavily dependent on new transport infrastructure for which there is no start date within the next ten years.

30. But *there is no indication in this policy of an overall strategic view as required by NPPF Policy TR1*, nor any significant attempt to address the challenges – increases in traffic volumes; reductions in average speeds on the roads; more road junctions beyond their capacity; more overcrowding on trains and buses; more stations operating beyond capacity; the increasing difficulties for freight delivery, especially but not only for kerbside loading in central London; and so on – outlined in the modelling report prepared alongside the Draft Plan. The policy provides no measures to meet the 80% target for sustainable travel; and its focus on transport as an enabler of growth omits any reference to improvements in health, well-being, and the quality of life.

31. Further issues arise because of the increase in availability and use of dockless electric bikes the lack of sufficient parking bays for them, and the dangers that their misuse cause to pedestrians and others; and again these issues are not addressed anywhere in the Draft Plan. Rather, Clause A.2 leaves it to individual boroughs to address such issues in their local plans, by identifying interventions of the kind outlined in Box MBUL5. But the lack of any overall strategy will hamstring local planners in identifying the most beneficial interventions they can make. **The policy therefore fails to meet the requirements of the NPPF and the need for a vision-based approach to transport. If this cannot be remedied in time for submission to the Examination Panel, there must be a commitment to follow the London Plan very rapidly with a new Transport Strategy.**

#### **MBUL6 High-Quality Design**

32. We **strongly support** the requirement (Clause A.1) for plan-makers to promote the development and use of design codes and guides that complement and add to the *Design and Placemaking Planning Practice Guidance*, the promised national model design codes, and the new draft *London Small Sites Design Code*. We shall respond to the latter draft in due course. We also **support** the development management requirements for individual developments set out in Clauses B-D. We particularly **welcome** the statement on the two-way nature of the agent of change principle in Clause B.7 and the requirements for applications to undergo a design review process in Clause D.

33. **We suggest that the implementation points made in paras 2.84 to 2.87 are of crucial importance and propose that they should be incorporated into the Development Management section of the policy itself.**

34. But we are disappointed that the Plan does not at any point address the key issue of construction standards and quality enforcement. Residents and inspectors report increasing problems including breaches in building regulations, faulty insulation, poor brickwork and carpentry, soundproofing problems, and damp and mould. Pre-handover inspections are clearly often rushed and slapdash. **We propose that there should be a requirement for planning approvals to include commitments to third party inspection at key stages of construction.**

#### **MBUL7 London's Heritage**

35. We acknowledge the consolidation of the policies in the current London Plan, and that national policies set out in the NPPF are now much more detailed than they were previously. It is sensible, therefore, that para 2.96 states that the NPPF policies (HE1-10) should be appropriately applied in the London context. Nevertheless, we are concerned that the protections provided in a London-specific context by Policy HC1 C in the current London Plan have been abandoned. These include the need for active management of the cumulative impacts of incremental change, and early integration of heritage considerations into design. These protections do not appear in the NPPF other than in Policy HE8 for World Heritage Sites (on which MBUL7 focuses). They do not therefore apply more widely to heritage assets including listed buildings and conservation areas. **We propose that the protections provided in Policy HC1C of the current London Plan should be reinstated.**

36. It is disappointing that no reference is made in the list of London's major heritage assets in paragraph 2.104. to London's major cemeteries, including the so-called "Magnificent Seven".
37. As we have noted in our responses to Policies MBUL 1 and 3, GHR9, and PV8, the absence of any effective policies for the Thames Policy Areas has meant that the settings of listed buildings, parks and gardens, conservation areas and other heritage assets on both banks of the Thames have been irrevocably damaged by developments of tall buildings over the past two decades. *The failure over many years to develop and implement a vision-based approach to protect and enhance the banks of the Thames as London's central character asset **must be remedied as a matter of urgency**, and Mayoral scrutiny of proposed tall buildings must be used for that purpose. The recent application for a 30-storey tower at Battersea Bridge, rejected on appeal because of the damage to townscape and heritage assets, was a reminder of the severe risks to the Thames and its setting.*

#### **MBUL8 Inclusive Design**

38. We **support** this policy and the requirement for an evacuation lift to meet the needs of disabled people. But *we **propose** that Clause B3 should be amplified using some of the wording in para 2.108.*

#### **MBUL9 Healthy Streets and Public Realm**

39. We **support** this policy in general terms. *But we **question** why there are no plan-making policies to encourage local plan-makers to adopt Healthy Street approaches in development management policies that are specific to their localities, including the need to enhance greening of kerbsides to provide shade, support for drainage and improved biodiversity.*
40. *Whilst we **support** the need to minimise pavement crossovers, especially in residential areas, we question the general prescription in Clause B5 to avoid vehicle crossovers, which would of course include those for off-street freight, delivery and servicing facilities.*

#### **MBUL10 Security and Safety**

41. We **support** this policy, *though it should **make reference** to the requirements of NPPF Policy P5b relating to the many types of development where large numbers of people are likely to congregate.*

## Chapter 3. Housing

42. As we indicate in our comments on Chapter 1, and discuss in detail in our Appendix A, we believe that the evidential base for the housing target and its component parts - as provided in the SHMA and its Addendum, the SHLAA, and the Viability Study - is founded on unsatisfactory methodologies and assumptions, and it does not provide figures that can be regarded as properly determined. The SHLAA makes questionable assumptions and ignores sensitivity analysis that shows high levels of uncertainty about its results. The SHMA and its Addendum make even more arbitrary assumptions that dramatically overestimate the number of homes needed in the market sale and rent sectors, and under-estimate the need for affordable homes, particularly those for social rent.
43. As we show in our Appendix A, the over-estimate in the SHMA of the need for market homes derives from the failure to undertake a real-terms analysis of house prices, or of movements in different parts of the London housing market. Overall, house purchase prices are falling, particularly in real terms, and there is no evidence of a need in London for dramatic measures to stimulate either supply or demand. The position in the private rent sector is dramatically different, as real terms analysis shows significant falls in affordability.
44. *The affordability crisis of the 2010s for purchasers has been replaced by a crisis for renters. There is a desperate need for radical action to provide more homes for social rent. The Mayor's strategic target of 50% of new homes to be affordable over the longer-term plan period (para 3.8) is far too low and **should be increased** as a matter of urgency.*
45. Major failures in the methodology of the SHMA and its Addendum also produce very large over-estimates of the need in the market, intermediate and social rent sectors for one-bedroom homes across London, and equally large under-estimates of the need for family-sized homes. We return to these in our response to Policy HN7.
46. As we also show in our Appendix A, the SHLAA also suffers from major problems in methodology, with questionable assumptions about the links between the availability and viability of development sites, and a failure to take account of sensitivity analysis that shows high levels of uncertainty about its results. The Viability Assessment similarly employs a series of optimistic assumptions to produce *indicative estimates* that are then turned into *hard policy thresholds* for affordable housing.
47. *We therefore share the widespread consensus that even the Draft Plan target of 558,000 net additional homes in the first ten years is not feasible, and thus highly unlikely to be met. It is critical therefore that in the rest of the process leading up to final approval of the next London Plan, the target – and the components from which it is made up, including the sub-targets for different housing tenure, housing size mix, and for each borough – are **rigorously reviewed**.*

## HN1 Increasing London's housing stock

48. We do not understand the purport of Figure 3.1, which precedes this policy, but is nowhere referred to in it (or indeed in any other policy). The locations shown replicate those shown in Figure 2.1, but with the addition of 11 additional 'BLG Town Centres and Other', *the status of which is nowhere explained*.
49. There is clearly a need for sustained increases in housing stock of various types, and we support the brownfield first approach. The ten-year targets for each borough in Table 3.1 are drawn from the SHLAA, which for reasons set out in paragraphs 1-3 above and in our Appendix A should not be regarded as reliable. The targets are not based on an assessment of need, nor do we believe that for many boroughs they are feasible. They must be subject to rigorous review. *Hence individual boroughs will need to review whether capacity indicated for them is in practice deliverable in the first ten years; and the Mayor should take proper account of the evidence presented by boroughs as to those targets. Boroughs should not face penalties if they fail to meet them.*
50. We **support** the retention (paras 3.18-3.20) of the rates set in the 2021 Plan for non-self-contained accommodation in contributing towards the overall targets. *But more substantially, we are concerned that in this and succeeding policies in this chapter, there is no equivalent to Policy H9D in the current London Plan, and indeed no mention of the role of houses in multiple occupation (HMOs) in meeting London's strategic housing needs.*
51. We **propose** that the title for Table 3.1 should read 'Net Additional Homes for .....'. More substantially, we are concerned also about the extent to which the targets for each borough in Table 3.1 imply the loss of industrial and other employment land. The lack of transparency on this and other aspects of how the targets were determined means that it is impossible to judge the extent to which they are in tension or even conflict with other policies in the Draft Plan, particularly those in Chapter 4; and whether the targets are indeed feasible. We return to these points in our comments on Policies GLE2 and PV5.

## HN2 Protecting and Reshaping Housing

52. We **support** policies to protect the current stock of housing in terms of the number of homes and of floorspace with tenures that are at least as affordable. But the draft policy is unclear as to whether it applies to reconversions of family-sized houses that have been converted into flats, so that they become houses for a single family once more. Such reconversions could result in significant loss of small units. *Hence we propose that the policy should be clarified, by specifying all targets in terms of "net additional homes".*
53. Countless reports have pointed to the poor quality and poor state of repair that blights significant proportions of London's housing stock across all sectors, public and private. It is highly regrettable that the Draft Plan retreats from even the few references in the current London Plan to refurbishment and repair, and has nothing to say about them, for example, as a possible alternative to estate regeneration. *Protecting and reshaping housing must involve repair and refurbishment where appropriate. It is too important an issue for many Londoners to be ignored by policy-makers. At the very*

least, we **propose** that Clause A should be strengthened to make clear that loss of existing housing will be resisted unless options for repair and refurbishment have been fully considered.

### HN3 Delivering Affordable Housing

54. The key housing need in London is homes for low-cost rent. For the reasons set out in our Appendix A, we believe that the strategic target of 50% for affordable housing is far too low, and that it should be urgently and significantly increased. We also believe that Clauses A.1, 2 and 3 are at best in strong tension, and more likely incompatible with each other. They undercut the ambition expressed in para 3.4 of the introduction to this chapter, which states that “affordable housing is essential to ensure an inclusive city and healthy communities, but also to London’s growth and productivity.”
55. The threshold approach that Clause A.3 enjoins boroughs to follow (set out in detail in Tables 3.2 and 3.3) will in effect mean that the 50% strategic target will not be met. Nor is it clear how, without further very substantial increases in funding, boroughs will be able to meet the requirement that they should ‘seek collectively’ over ten years to deliver just under 340k homes (thus 60% of the overall target) as low-cost rent and intermediate homes. It is not even clear what mechanism boroughs might use to ‘seek collectively’ to meet that target. Moreover, the target of c240k low-cost rent homes would not even meet the current combined total as shown in the SHMA of homeless households and those in overcrowded social rent housing.
56. *It is crucial, therefore, that the targets for affordable, and especially for low-cost rent, housing should be **significantly increased**.*
57. The threshold affordable housing requirements set out in Tables 3.2 and 3.3 must also be reviewed, since they will not allow even the strategic target of 50% for affordable housing to be met. *The methods by which both the percentage requirements and the locational bands shown in Figure 3.2 were determined are wholly unclear. It is, for instance, unclear why LB of Hounslow is not in Band B, like LB of Ealing. The methods should therefore be explained and made open for examination as a matter of urgency.*
58. It is estimated that consented schemes to provide over 300k homes are currently stalled, many of them for far longer than two years. It is crucially important that all possible steps are taken to avoid further growth in the numbers of stalled schemes. We therefore **welcome** the new requirement (Clause H) that developments following the fast-track route should undergo an early-stage viability review if substantial progress with the scheme has not been made within two years. *We note, however, that the statement in para 3.38 that an Early-Stage Review is required ‘for all applications regardless of the route they follow’ seems to remove the need for progress in build-out. That requires **clarification**. It is also critically important that Planning Departments must be given the resources to meet any requirement for early-stage reviews.*
59. *We believe that the request (para 3.56) to Councils to set up systems and processes to facilitate the take-up of intermediate homes is important enough to be **included in the policies in HN3 itself**,* rather than being relegated to a matter of implementation.

## HN4 Gypsy and Traveller Accommodation

60. We **support** the policy, but we note that the targets in HN4 Table 3.4 are an amalgam of two separate figures presented in the *Gypsy and Traveller Accommodation Needs Assessment (GTANA)*. Table 3.4 gives targets for 2027 to 2037 that simply add together the needs for pitches shown in the GTANA for 2022-23 to 2026-27 (thus essentially in the past) and those for the five years 2027-28 to 2031-32. The total target shown in Table 3.4 is thus 876. But if the GTNA figures for the five years 2027-28 to 2031-32 were simply increased to a ten-year target up to 2037, the total would be 354. Combining an assessment of past need with an assessment covering five years into the future thus leads to a target two-and-a-half times the level that would be set if the five-year target were simply doubled. **The figures therefore need to be reviewed, taking account of backlogs of unmet need.**

## HN5 Managing Specialist Accommodation

61. We wish to highlight two problems with this policy, where **once again, it is important that the targets should be expressed as net additional**. First, with regard to Purpose Built Student Accommodation (PBSA) we believe that the *Student Accommodation Study (SAS)* continues to over-estimate demand for accommodation, and to underplay the likelihood of falls in student numbers over the next decade, driven by factors including declines already seen in overseas student numbers, a fall in the size of the domestic 18-year-old cohort, and cost pressures.

62. Policy H15 in the current London Plan for PBSA did not set either an overall target or targets for individual boroughs. It simply mentioned that a need for 3.5k bedspaces a year had 'been identified'. But the six years since 2021 have seen significant increases in PBSA, with many more in the pipeline; and this growth has been accompanied by notable concentrations in locations such as North Acton. The SAS does not provide figures on the numbers of bedrooms provided since 2021, or of those in the pipeline.

63. Thus while we support the provision of PBSA **we do not accept the ten-year target of 31.5k bedspaces or the distribution in Table 3.6. Moreover, while we accept that PBSA should be distributed effectively and equitably across London, and we welcome Clause A.2 on the need to identify areas of concentration, we propose that the policy be strengthened to make it clear that such concentrations should wherever possible be avoided. And we cannot accept targets based on unclear assumptions and methodologies, and which do not take any account of what has been built already<sup>4</sup>.**

64. We would also welcome clarification of Clause I, which seems to imply that nomination agreements with a higher education provider will be required only for Affordable PBSA, rather than for PBSA developments as a whole.

65. Second, with regard to Specialist, Supported and Older Persons Accommodation (SSOPA), we note that the targets in Table 3.7 are calculated on a different basis from

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<sup>4</sup> We note that Wandsworth Council has adopted after a formal review of its Local Plan a policy which would support only those PBSA developments that 'would not compromise a site's capacity to meet the borough's need for conventional dwellings'. In a borough where only brownfield land is available for development this policy is a severe constraint on PBSA development. But Wandsworth has been given the second highest target, 1663 PBSA units a year. That target is incompatible with the new Local Plan policy, which was not opposed by the GLA at the EIP.

those included in the current 2021 Plan. The Draft Plan states (para 3.78, but not in the policy itself) that it does not cover private sector retirement housing, whereas the 2021 Plan states (para 4.13.5) that Policy H13 does cover such housing. *The change in policy, and the reduced targets set for older persons housing in HN5 Table 3.7 as compared with Table 4.3 in the 2021 Plan, should be identified and made much clearer.*

66. *More generally, it is regrettable that the housing needs of older persons as an overall group are not treated specifically in the Draft Plan, especially since they are assigned in the SHMA a critical role – without any suggested mechanism or incentive - in downsizing and thus making more homes available for younger families. Housing for all older people should be addressed explicitly*

## **HN6 Build to Rent**

67. We **support** this policy.

## **HN7 Housing Size Mix**

68. The Draft Plan repeats in its rationale (para 3.95) for this policy the statement made in the 2021 Plan that London is a single housing market. That claim is at best misleading, and the great majority of economists would say it is simply untrue, *and it should be deleted*. Readily-available price data readily clearly shows substantial differences between the markets in different parts of London and for different kinds of housing. There are of course connections between the markets for different kinds of housing in different parts of London. But the markets in high-value districts in Central London perform quite differently from those in the outer suburbs. The supply and demand profiles for houses and flats are similarly quite different; and the private rental sector again performs quite differently from the market sale sector. And most importantly in the context of this policy, the markets differ by price tier and by size of property.

69. The rationale ignores these differences and claims that the huge majority of London's need is for one and two-bedroom homes. This claim is also highly misleading, based on a flawed methodology in the London-wide SHMA. It is notable that the Draft Plan abandons the SHMA with regard to affordable housing, advising boroughs in para 3.93 that local registers for social and intermediate housing provide a firm basis for local policies on size mix. We **strongly support** this approach. But the local assessment approach is rejected in Clause B., which requires that any local policy on housing size mix for market homes should be based on the SHMA. As we show in detail below, the SHMA is faulty, and its figures on size mix cannot be relied upon. *While we strongly support Clause A of this policy, we cannot agree with Clause B. We propose that it be amended to state that "Any Local Plan policy on housing size mix for market homes should be based on a Local Housing Needs Assessment."*

70. The SHMA identifies one-bedroom homes as the single largest category of need across London: 55% of the total, rising to a fantastical 65% in the crudely-constructed Addendum. This focus on small units is subject to many of the methodological flaws noted in our introduction to this Chapter and in our Appendix A. It is driven overwhelmingly by a) the unexamined assumption that there should be a return to the household formation rates seen in 2001 (why not 1991, or 2011?); b) the desire to eliminate the estimated backlog of concealed households, and c) the assumption

that an ageing population wishes to downsize (though it usually has no incentive to do so). Taken together, these assumptions have a dramatic effect in increasing the numbers and proportions of market sale and rent homes needed, and of one-bedroom units in the housing mix. *Other assumptions would have reduced those numbers substantially, increasing instead the numbers and proportions of social rent homes, and of family-sized units. But other assumptions are not tested.*

71. The Addendum to the SHMA makes matters even worse, its crude construction making for a reduction in the numbers of 3+-bedroom homes needed from 12% of the total to an absurd 0%, with a negative figure for market homes. The SHMA and the Draft Plan thus risk seriously under-providing the family homes to allow single people to develop long-term relationships, to have children, and then to stay in London rather than leaving for family-sized housing elsewhere. This is in part the result of treating changes in population as exogenous, despite the report's recognition that the net outflow of families from London is now long-standing and is related to the shortage of family-sized housing. The SHMA thus *fails to acknowledge that seeking to meet its assessment of current needs is likely simply to reinforce the negative impacts of an oversupply of small housing units: low fertility, family flight from London, and unbalanced, unstable communities.* The impact on schools is now well-known, with declining rolls in inner London primary schools in particular (though this will soon be felt in secondary schools too). But *no effective measures are being taken to address the problem, which is not even mentioned in the Draft Plan.*
72. A large part of the estimated need for one-bedroom units is for an assumed number of 'concealed households': single people and couples currently sharing with friends and family. As noted above, the estimated numbers are subject to large margins of error. But even if they are correct, building large numbers of one-bed units will not by itself address the affordability pressures of high rents relative to income that caused the concealment. If the new units are unaffordable, the concealed households will remain concealed. This is a particular risk given the report's proposed tenure split (43,800 market vs 45,500 affordable).
73. The SHMA also shows that overcrowding is concentrated in families in rented housing and some ethnic minority households. They are precisely the households who need 3+ bedroom, low-cost rent homes and represent the most acute form of housing stress in the report. But the SHMA essentially ignores the needs of families suffering the most severe form of hardship and whose requirements are the most expensive to deliver. There is a real risk that those requirements are trumped by establishing a pipeline dominated by smaller, cheaper and more profitable units.
74. The SHMA also claims that there is a *negative* need for market 3+ bedroom homes, thus assuming that London needs zero net new family-sized market housing. This in turn assumes that existing family-sized stock currently occupied by under-occupying older owners will become available to families. *But there is no policy to establish a mechanism by which that happens or to address the lack of incentives for older people to downsize.* The "under-occupied" 3+ bedroom homes are not, in practice, part of the family-home supply unless something incentivises older owners to downsize. At the same time prices and rents for family-sized homes are already shown in the SHMA to be high relative to the rest of England. The suggestion that no

new market family-sized homes are needed at all – indeed that there is a negative requirement - sits very awkwardly alongside evidence indicating that the market is short of precisely that kind of stock.

75. For all these reasons, the proposal that the housing programme should be skewed 65% across all tenures (25% in the social rent and 100% in the market sectors) in favour of one-bed units – as suggested by the faulty methodology in the SHMA Addendum - is completely unsupported by the facts. *While we strongly support Clause A of this policy, we cannot agree with Clause B. We **propose** that Clause B be amended to state that “Any Local Plan policy on housing size mix for market homes should be based on a Local Housing Need Assessment”.*

### HN8 Housing Design

76. We **support** most aspects of this policy, and we welcome the new requirements that a) all habitable rooms should have openable windows (Clause A.2); and b) that simplifying and reducing the costs of maintenance and servicing for the long term should be addressed in the design of the building (Clause E). We particularly **welcome** the advice (para 3.103) that features should be employed to minimise life-time costs and the need for repair and replacements even if the initial cost is higher. We also **strongly support** the requirements for internal and private external space that exceed the Nationally Described Space Standard (NDSS).
77. We **object**, however, to the weakening in Clause A of Policy D6C in the 2021 Plan with regard to single aspect homes. *We believe that single aspect homes should be wholly exceptional, and we therefore **propose** that the wording of the current Policy D6C (that they should normally be avoided) should be retained.*
78. *We regret also the reduction in Clause B.2 of the minimum ceiling height from 2.5 to 2.4 metres. We recognise that is still in excess of the NDSS; but we see **no good reason** for the reduction.*
79. *Nevertheless, there is an urgent need for modelling of the impact that combinations of the various design requirements have on the volumes and types of housing that can be provided on individual sites. It is important also that the promised design guide should provide advice on how to avoid monotonous long blocks and tall towers.*

### HN9 Accessible Housing

80. We **strongly welcome** the much firmer set of requirements as compared to those in the 2021 Plan. We also **welcome** the noise performance standard for new homes in Clause C.
81. *We **propose** that the recommendations on impact sound transmission and noise levels in paragraphs 3.117 and 3.118 should be part of the policy.*

### HN10 Burial Space

82. We have no comment on this policy, other than *that it does not belong in this Chapter. It should sit either in Chapter 2, or in Chapter 4.*

## Chapter 4. London's Economy

83. We acknowledge that the policies in this Chapter are based on the ambitions set out in the *London Growth Plan*, which we **support**. We recognise also that creating the conditions to realise those ambitions presents challenges for spatial planners.

### GLE1 Employment Space

84. We **support** this policy and in particular the encouragement given to boroughs to use Article 4 Directions to remove permitted development rights for commercial to residential development in targeted areas (para 4.12). We also **support** the freedom for boroughs to set conditions where necessary to maintain an appropriate balance of uses in specific cases (para 4.14).

### GLE2 Supply of Industrial Land

85. It is important that boroughs should be enabled to support industrial intensification, consolidation, and relocation. We therefore **support** this policy, and in particular the requirement for boroughs to review the boundaries of their Strategic Industrial Locations (SILs) and Locally Significant Industrial Sites (LSISs); and where appropriate to designate new areas (Clauses C and D). We also note the strong development management policy (Clause F and para 4.19) to restrict non-industrial development in SILs and LSISs. But we regret the abandonment of the work in the Draft London Plan Guidance on *Industrial Land Uses* covering the possibility of co-locating industrial and other uses. We also note a strong tension between this policy and Policy PV5, which requires the release of industrial land for housing. *There is no indication in the Draft Plan as to how this tension is to be resolved.*

86. We note further that boroughs are encouraged to work collaboratively to provide and re-provide land for industrial uses in their Property Market Area (PMA); and that the demand benchmarks for storage and distribution set in Table 4.1, as well as the servicing of leisure and hospitality are especially challenging in the Central Services Area (para 4.24). *But Policy GLE2 fails to set out any mechanism as to how this collaboration across large PMAs is to be achieved, in a context where industrial land is to be lost to housing.*

87. *There is an urgent need to ensure that small industrial - particularly manufacturing - businesses are protected wherever possible, and not in significant part displaced by logistics and warehouse uses. We therefore propose that the policy should be strengthened to require that net reductions in industrial space should be avoided wherever possible.*

### GLE3 Data Centres

88. We understand that data centres are not among the uses appropriate for industrial land (para 4.36). But we are astonished by the conflict between Clauses D and E. Clause D rightly provides support for data centre proposals in 'suitable locations'; but Clause E then seeks to set requirements for data centres in 'other locations' (thus logically *unsuitable* locations). *This cannot be right and must be amended.*

89. We **welcome** the provisions on heat recovery, electricity and water efficiency measures and electricity generation in Clause F. But *we are aware that innovations in*

*all these areas are rapid, and that there will be a need to flex and amend policies in relation to them.*

#### **GLE4 Night-Time Economy**

90. For the most part we **support** this policy, which largely replicates Policy HC6 in the current London Plan. We believe, however, that it is wrong to frame the policy to apply to all activities between 6pm and 6am. The impact of these activities varies at different stages during those hours. What might be acceptable between 6pm and 9pm or 10pm may be unacceptable between midnight and 5am. *This more nuanced assessment of impact should be taken into account in developing the policy further.*

91. **We also have strong reservations** about the new Clause A3, which requires boroughs to support 24-hour operation for SILs and LSISs. That may well be appropriate or even necessary in many cases, but not in all, especially where commercial or industrial locations are close to residential areas. *We oppose any requirement for blanket support for 24-hour operation; and we propose that a reference to the two-way agent of change principle should be added to Clause A.5*

92. We have welcomed in our response to Policy MBUL 6 the requirements for new developments to comply with the two-way nature of the agent of change principle. But we believe that the failure to make the same requirements for night-time economy uses in this policy is unacceptable. *We urge that a new Clause B.7 should be added to require proposals to “incorporate proportionate measures to minimise the external impact of their own use and operation on existing sensitive uses in the area in line with the agent of change principle”.*

93. We **support** the policies in Clause B to protect existing pubs which have a “heritage, economic, social or cultural value to local communities”. But we have strong reservations about Clause C on proposals for new pubs which “contribute positively to the vibrancy of town centres, the CAZ and nightlife clusters”, without any requirement to add value to the local community. Clause B.1 already requires proposals to “support a mix of night-time uses”, and so the addition of ‘vibrancy’ is otiose. *We urge that Clause C should be deleted, or at the least amended to add a requirement to provide economic, social or cultural value to local communities.*

94. Out-of-hours servicing and deliveries in areas where there are existing sensitive uses need to be carefully planned and conditioned in accordance with the two-way agent of change principle, and there is a need to avoid the impact of these activities on existing uses being overlooked. *GLE4 A (5) should be amended to read “support an integrated approach through proactive coordination and engagement with licensing, transport, out-of-hours servicing and deliveries, community safety and security, and environmental and cleansing services whilst complying with the agent of change principle”.*

#### **GLE5 Culture and Creative Industries**

95. We **support** the generality of this policy, but the clumsy focus on consumption and production misses out a large part of cultural activity in London. Much - perhaps a majority - of the music-making, drama, dance, craft-making and art is done by community groups who need specialist space and facilities. This was recognised in

Policy HC5 of the current London Plan, and it is now omitted. *That omission must be reversed.*

96. We also **welcome** the support in Clause E for meanwhile cultural uses at appropriate sites in all areas. But it is important that existing industrial, commercial or residential uses should be protected from the impact of such uses, in accordance with the agent of change principle. *We propose that this be made explicit in the Policy.*

#### **GLE6 Visitor Infrastructure**

97. We **support** this policy and in particular the resistance to developments for short-term lets (Clause G). But while Clause B provides welcome support for enhancements to visitor infrastructure, it is not clear how boroughs will be able in their local plans to ensure that such enhancements are delivered, or indeed how loss or degrading of the infrastructure are to be avoided. This is of particular importance in hotspots in the CAZ and elsewhere, where the current infrastructure is already inadequate to meet current levels of tourism. We note also that *the references to convention centres in Policy E10 in the current London Plan have been omitted. It is not clear why.*

#### **GLE7 Affordable Workspace**

98. We **support** this policy, particularly the new references to hospitality, food and beverage uses in Clause B.2 and to the protection of existing affordable workspace (Clause E). *But we propose that boroughs should be required to plan proactively for the creation and enhancement of hubs of affordable workspace, rather than approaching the issue piecemeal in response to individual planning applications, which often results in scattered and unplanned provision.*

#### **GLE8 Employment and Skills**

99. We **support** this policy, and particularly the new reference to under-represented groups in the construction industry and other sectors

#### **GLE9 Aviation**

100. We **support** this policy in general terms, particularly its recognition (Clauses F-H) that advanced air mobility (AAM) in its various forms will become an increasing challenge over the next ten years. We recognise, however, that these policies may need to change in the light of experience.
101. The claim in Clause A that London's six main airports (only two of them in the GLA area) operate as a single aviation system is false. They are separately owned and operated, and they compete with each other. That is why Policy T8 in the current London Plan stated that in any change in London's airspace, they should be treated equitably. *That reference should be retained in the new policy.*
102. We note that in line with Government policy, Clauses B and C require that expansion at Heathrow should be refused unless key environmental, transport and other conditions are met. We note also that in recent months, Gatwick has secured permission for its second runway and that there are more flights at City airport. *Further consideration of these policies may be necessary once the Government has responded to the recent consultation on the National Policy Statement for expansion of Heathrow airport (HEAN).*

103. Clause D rightly retains the policy that new heliports should be refused. But it then adds a sentence about changes in the 'mix of operations' at other airports. *If it is intended to mean increases in helicopter traffic beyond the existing heliports, then it should say so.*

#### GLE10 Safeguarded Wharves

104. We **strongly support** the increasing use of the Thames for freight. But we are concerned that the aim to ensure that there is capacity for 11m tonnes of capacity is less than the forecast demand as shown in the recent study of demand and capacity. We recognise the constraints on capacity, but *we urge that it be reviewed and monitored closely.*
105. *We also have strong reservations about the requirement (Clauses A.1, C and D) that wharves should operate 24/7, which is in any case impracticable for the west London wharves.*
106. We are **disappointed** that neither this policy nor Policy GHR9 makes any attempt to address the scope for removing the constraints that could release the potential for significant increases in waterborne freight on waterways other than the Thames, including some of London's canals.

#### GLE11 Circular Economy

107. We have two main concerns about this policy. First, *it includes no requirement for boroughs to include circular economy principles in their local plans, as was at least implied in Policy SI 7 in the current London Plan.*
108. Second, it focuses solely on waste created in the development process, and *it says nothing about recycling more generally.*

#### GLE12 Waste

109. We **support** this policy in general terms, but we regret that requirements to adopt and promote circular economy principles have been significantly reduced when compared with the current London Plan.
110. The policy lacks any requirements for plastics recycling. Many boroughs refuse to collect other than rigid plastics, and so non-rigid plastics go to land-fill or incineration, both of which result in pollution. We recognise that a programme to develop the infrastructure to collect and process flexible plastic waste is included in the London Infrastructure Framework (LIF). *But we propose that the policy should include some encouragement for boroughs to co-operate with supermarkets and others to promote recycling for non-rigid plastics.*

#### GLE13 Aggregates and Mineral Resources

111. We have no comment on this policy, which we believe is in line with the NPPF.

## Chapter 5. Green, Healthy, Resilient

112. We **support** the new emphasis in this chapter on reducing energy consumption, alongside protecting and enhancing the natural environment. We note, however, that GLA officers have suggested in webinars that the policies in this chapter may prove challenging for developers, and that there may be a need for a ‘transition’ approach to implementation. We understand the reasons for that, but it may prove difficult for boroughs in assessing applications. *We propose, therefore, that if the suggested approach is necessary, it should be introduced in close consultation with planning officers as well as developers.*

### GHR1 Energy Efficiency

113. We support this new policy, and the requirement for boroughs to set energy efficiency and emissions reduction standards in local plans. But we note that while in-use energy monitoring data should be reported to the GLA for at least five years post-occupation (para 5.17) *it is not explained what action will be taken if the figures indicate failure in the design or materials or the build state of the development does not meet GHR1's expectations.*

### GHR2 Low-Cost, Low-Carbon Heat

114. Again, we **support** this new policy, and the requirement for boroughs to identify Heat Network Zones in local plans, and for major developments to submit low carbon heat appraisals.

### GHR3 Whole-Life-Cycle Carbon

115. We **support** the requirement for developments to assess the potential for retaining existing buildings and to minimise embodied carbon emissions. *We propose, however, that the wording of para 5.32 on weighing the benefits of energy efficiency in a new building alongside those of building retention should be added to policy D of the main policy.*

### GHR4 Heat Risk

116. In the light of the increase in summer temperatures since 2021, we **welcome** the significant strengthening of Policy SI4 in the current London Plan.

### GHR5 Flood Risk and Drainage

117. We **welcome** the strengthening of Policy SI12 in the current London Plan, and the new requirement for boroughs to plan for Sustainable Urban Drainage Systems (SUDS) at a neighbourhood scale in their local plans. *We propose, however, that Clause A.1 should be strengthened by adding reference in line 1 to flood plains and wetlands.*

### GHR6 Trees, Biodiversity and Geodiversity

118. We **support** the consolidation and strengthening of Policies G6, G7 and G9 in the current London Plan, though *we regret the omission of the requirements in the current Policy G8 on food growing and allotments, which we propose should be retained and added to the draft policy.*

## GHR7 Green Infrastructure and Urban Greening Factor

119. We **support** the requirements in this policy, which largely replicate those in the current London Plan.

## GHR8 Accessible Green Space

120. We **support** most aspects of this policy. But we **strongly oppose** Clause A.2 which would allow boroughs to set in their local plans standards lower than those set in Natural England's Green Infrastructure Framework. *We can find no justification for such a lowering of standards. The clause should be deleted.*
121. *We also propose that Clause A should be strengthened to protect access to existing green space, by requiring boroughs to take account of the impact that the scale, frequency and duration of commercial events can have on public access, informal recreation and enjoyment of such spaces.*
122. *We also propose an additional clause D.iv to require developers to demonstrate how accessible green space will for the long term be funded and maintained.*

## GHR9 Clean and Healthy Waterways

123. We **support** this policy, with one strong exception. Clause A.2 requires boroughs to designate in their plans Thames Policy Areas (TPAs) and also to incorporate relevant elements of Joint Thames Strategies and the strategies in Box GHR9. Similar requirements have been included in successive London Plans, and Policy SI14 in the current plan makes clear that the TPAs and joint strategies should have a broad remit. But as we noted in our comments on Policies MBUL 1 and 3, there is no reference to them in those policies, or indeed in any other of the MBUL policies. Hence it is open to question whether any substantial weight (or even any weight at all) is given to them either in this Draft Plan or in local plans. *This must change.*
124. Although significant work is under way on the Joint Thames Strategy for Kew to Chelsea, in essence, there are no joint strategies at all east of Chelsea; and what does exist does not cover anything near the broad remit set for joint strategies in successive London Plans. This is perhaps not surprising given that so little attention is given to the TPAs.
125. *It is therefore critically important that proper attention is given to ensuring that TPAs are given due weight in the Draft Plan, and that measures are taken to ensure that joint strategies are updated to cover the remit given to them in the current London Plan. New or updated Thames Landscape Strategies must be devised and adopted by riparian boroughs from Richmond upon Thames to Havering and Bexley.*
126. *It is also highly regrettable that there is no provision in GHR9 that would deal with the discharge of sewage into the Thames downstream of the Mogden Sewage works unless Thames Water were to extend the Thames Tideway Sewer Tunnel upstream to that plant.*
127. We are disappointed that neither this policy nor Policy GLE 10 makes any attempt to address the scope for removing the constraints that could release the potential for significant increases in waterborne freight on waterways other than the Thames, including some of London's canals. *We propose that a requirement should be added to this policy to promote water-borne freight by removing those constraints.*

## GHR10 Air Quality

128. We **welcome** the focus on air quality and pollution throughout the Draft Plan, and the strengthening of Policy SI 1 in the current London Plan. *Nevertheless, we are concerned that the Draft Plan may not comply with **NPPF Policy P1**, since it fails to meet the requirement to identify opportunities to reduce many other kinds of pollution.*

## GHR11 Cycle and Car Parking

129. We **welcome** the introduction of a needs-based approach to cycle parking requirements. The growing availability and use of dockless electric bikes have, however, transformed cycling across London, with implications for the provision of cycle parking places in different kinds of locations, including a reduction in the need for long-term parking for offices. *We have strong reservations about the banding of provision for provision of long-term parking by borough, particularly in central London; there is no good reason why provision should vary on different sides of the street on the boundary between Camden and Westminster, for example. SAM would be a much better measure for banding.*
130. We also believe that setting parking requirements by reference to cycle ownership is no longer sustainable. *Development proposals should also be required in Clause A to provide accessible space and infrastructure within the curtilage of the development for public hire bikes.*
131. Overall, while the increase in cycling is welcome, *there is widespread concern about their misuse, particularly about where and how they are parked. These issues must be addressed as a matter of urgency in a new Transport Strategy (see our comments on Policy MBUL5).*
132. As to car parking, we **strongly support** the setting of maximum levels, and the use of SAM levels to determine the provision of parking places. The change from PTAL to SAM, however, makes it difficult to compare the levels relating to housing (Table 5.8) with those in the current London Plan (Table 10.3). We note also the sharp reduction in levels for retail and office developments (Table 5.9) as compared with those in Tables 10.4 and 10.5 in the current London Plan.
133. *We have some reservations about these reductions, particularly for those BFOAs where connectivity remains a problem. We urge in addition the need for policies to address the problems caused by wider cars that effectively block traffic for buses and other large vehicles. All these issues must be dealt with in a fully-revised Transport Strategy.*

## Chapter 6. Place Visions and Approaches

134. We support most of these policies. But **we propose, in line with our comments on Policies MBUL1, 3, and 7, GHR9, and PV8 (below), that the River Thames should be covered in this chapter as a core feature and asset in London's structure and character, with its own vision-based policy.**

### PV1 Brownfield First Opportunity Areas

135. The BFOAs will play a major part in London's growth over the next two decades, not least in providing for c400k new homes. We **support** this policy and the reduction in the number of Opportunity Areas. Nevertheless, we have a major concern about the absence of any review of the progress made in each area, many of them designated over 20 years ago. **The brief sketches provided in Annex E are wholly inadequate, and it is crucially important that policy in detail is based on an analysis of what has been achieved in each OA to date, and the lessons to be learned from that. We propose that a review of all OAs is undertaken as a matter of urgency.**

### PV2 Central Activities Zone

136. We **support** this policy, and in particular its support for the use of Article 4 Directions to remove Class E to residential PDRs where appropriate. **While new residential development may not be a priority, especially in the core CAZ, it is essential to protect existing housing (see Policy HN2) and the infrastructure on which it relies.**
137. We welcome the new distinction between core and mixed CAZ. **But in that context, we regret the loss of the reference in Policy SD4 H in the current London Plan to the need to enhance the attractiveness and inclusiveness of the CAZ to residents as well as visitors and businesses. We propose that the reference should be restored, along with a reference to the agent of change principle. We also regret the absence of cross-references to many other relevant policies, particularly MBUL 3 on tall buildings, MBUL7 on heritage, HN2 on protecting existing housing, GLE4 on the nighttime economy, and GLE6 on visitor infrastructure. Our comments on each of those policies apply equally to Policy PV2.**
138. With regard to Clause A.11, we note that during the webinars held in August, the London Plan Team said that if it were said to be non-viable to redevelop or refurbish offices, a viability assessment would be needed covering refurbishment and redevelopment. **We propose that this should be added either to Clause A.11 or to a new paragraph under Implementation.**
139. We are puzzled by the brevity of the references in Clause A6 and para 6.12 to the five transformational gateways based on railway termini, four of which are cross-borough or are close to borough boundaries. **Nowhere is it explained how or why these locations are to become transformational, or what kinds of transformation is to take place in these five locations. Simply naming them and referring to their potential is meaningless.**

### PV3 Town Centres and High Streets

140. We **support** the consolidation of Policies SD6-9 in the current London Plan into a single policy and the review that has led to a slight reduction in the number of town centres in Annex B and the reclassification of some of them.
141. We acknowledge the pressure to provide some more housing in town centres, as reflected in Clause A.4; but we also **strongly support** Clause B.4 which again allows the use of Article 4 Directions to remove Class E to residential PDRs where appropriate. We believe that such Directions should cover existing upper floor Class E uses in town centres, since they are valuable for small businesses and generate more footfall and more income for the centre than residential uses do. *Housing-led intensification in the centres listed in Annex B should not be at the expense of existing business uses.*
142. We also **support** Clauses A.8 and its backing for the redevelopment of low-density retail parks for intensified housing, distribution and other purposes.
143. *But we believe that the protection in policy A.9 against the creation of net increases in retail and leisure space outside town centres **should be strengthened**, so that only in exceptional circumstances should any substantial retail and leisure developments take place outside the current town centre network.*
144. We also **strongly support** Clause B.5 which would restrict concentrations of sui generis uses such as betting shops, games centres, takeaways, and loan shops. We note, however, that these policies may need to be amended if the Government proceeds with its proposals for new powers in this area. We also **welcome** the support in Clause E to street and covered markets.
145. Finally, we support the strategic and local partnership approaches, inclusive and representative of the local community, set out in para 6.25; and *we propose that this should be included in the policy itself.*

### PV4 Strategic Economic Clusters and Corridors

146. We **support** this policy and the list of clusters in Table 6.1. But we note in relation to Clause C.4 that there is as yet little evidence of success in the development of mixed uses that include housing in such clusters. We also note that *there are severe constraints in land availability in many of the designated clusters.*

### PV5 Industrial Land Supporting Housing Growth

147. We acknowledge the pressure to find land for housing wherever possible. But as we have stressed in our responses to the policies in Chapters 2 and 3, and in our Appendix A, we do not believe that the housing targets are sound or well founded. We therefore have strong reservations about this policy and the loss of industrial land and therefore of industrial capacity on top of what has been lost already in the past three decades. We have already noted the strong tension between this policy and Policy GLE2, which aims to support economic growth by meeting the needs of businesses, services and infrastructure that rely on industrial land. *We therefore cannot support this policy.*

## PV6 Metropolitan Open Land

148. We **welcome** the strengthening of Policy G3 in the current London Plan, and the new definition that requires any newly-designated MOL to remain permanently open. We **regret** that this seems to be all that remains of the suggestion in the 2025 document *Towards a New London Plan* that some of the many golf courses might be built on. We **strongly support** the policy that MOL is not to be treated as Green Belt, and that Policy PV7 does not apply to it. **This should be made clearer in the policy itself.**
149. We are puzzled by Clause G.2, which allows for extensions to existing buildings within MOL, provided that they do not result in 'additions over and above the size of the original building'. **We fail to understand how extensions cannot result in additions or enlargement (see the OED).**

## PV7 Development of the Green Belt

150. Once more we acknowledge the pressure to find land for housing wherever possible, but we believe that the housing targets are neither sound nor well founded. We also believe that the assumptions on which the scope and feasibility of developments in the Green Belt have been assessed in the SHLAA and in the *Viability Study* are at best over-optimistic, as we note in our Appendix A. We therefore have strong reservations about this policy and the impact it will have on the Green Belt. And as we noted in our response to Policy MBUL1, it is most unfortunate that the delays in establishing strategic planning authorities beyond the Green Belt mean that it has not been possible to cooperate with them in establishing where new housing and commercial developments should most appropriately be located.
151. We recognise that the policy is cast in broad terms, that much remains to be done in cooperation with the boroughs concerned, and that developments are unlikely in the short term. There is a particular need for greater clarity about development around stations and the infrastructures that they need. We are disappointed that the policy misses the opportunity to present a vision of what the changed Green Belt should look like in 20 years' time, its role and the purposes it should fulfil. In the absence of such a vision, we believe that the policy will undermine the current basic purposes of the Green Belt, as a check against urban sprawl and the merging of urban settlements. **We therefore cannot support this policy in its current form.**
152. The *Green Belt Strategic Approach Report* states that "It should be noted that as this study applied the policy criteria of the current (2021) London Plan; future assessments may need to review these findings against the new policies within the new London Plan." **That work should be completed before the Draft Plan is submitted for examination.**

## PV8 Strategic and Local Views

153. We **support** this policy in general terms, and we **welcome** the additions to the list of designated strategic views. We also **welcome** the consultation on the revised *London View Management Framework*, to which we shall respond in due course.

154. But we note that enforcement of Policy HC3 in the current London Plan – and indeed equivalent policies in previous plans – has been far from perfect. The view from Richmond Park to St Paul’s Cathedral, for example, has recently been damaged by a development at the Olympic Park. We **strongly support** the change in policy which now includes development in the background of protected views (Clause H 3).
155. Whilst 13 of the current 27 Designated Strategic Views are River Prospects, it is notable that important views in west London do not feature in the list of designated strategic views. None of the views across and along the Thames west of Lambeth Bridge feature in the list, even though some - such as Chelsea, Chiswick, Kew, and the arcadian Thames from Richmond Hill or Petersham - are iconic. In our response to the new draft *London View Management Framework* we shall suggest some additions to remedy that omission.
156. *We regret the decision to abandon in Table 6.4 the categorisation of designated strategic views used in the current London Plan Table 7.1. They were, and they remain, a useful set of categories.*
157. *As we noted in our responses to Policies MBUL1, 3, and 7, and GHR9, the absence of any effective policies for the Thames Policy Areas has meant that the settings of listed buildings, parks and gardens, conservation areas and other heritage assets on both banks of the Thames have been irrevocably damaged by developments of tall buildings over the past two decades. The failure over many years to develop and implement a vision-based approach to protect and enhance the banks of the Thames as London’s central character asset must be remedied as a matter of urgency. Moreover, there is an unprecedented opportunity to realise such an approach now that the vast majority of both the north and south banks of the river east of Tower Bridge are designated as growth areas.*

## **Glossary:**

**Agent of change:** The definition provided in the current London Plan Glossary should be included here.

### **Brownfield land**

**Density:** Measurements of net density should be provided for all planning applications that include new residential units, including the number of units per hectare and number of habitable rooms per hectare. (See Policy D3 of the current London Plan)

**Town centres:** The definition provided in the current London Plan Glossary should be included here.

**Environmental assessment:** Definition needed

**Local heritage strategies:** Definition needed

**Net density:** See under Density

**Net developable area:** As defined by the NPPF. For the purposes of measuring the net density of a proposed housing development, net developable area is the part of a site that can be developed for housing and directly associated uses, including access roads, hard landscaping (including footways, paved areas and servicing areas), private gardens, ground floor private and communal amenity space, ground level parking and incidental open spaces (including verges and threshold planting). It excludes land that is not suitable for built development, such as land required for strategic infrastructure, parks and public squares, and open spaces that deliver benefits as part of the wider green infrastructure network (including significant onsite biodiversity net gain enhancements and significant sustainable drainage features).

**Safeguard wharves:** The definition provided in the current London Plan Glossary should be included here.

## Draft Plan Annexes

### Annex A - Key Performance Indicators

We **welcome** the enhanced list of sixteen Key Performance Indicators (KPIs) for assessing progress in implementing the policies in the Draft Plan. But we suggest that KPI8 should include a measure of energy efficiency in the design of new homes.

Our major concern, however, is *that steps must be taken to improve the GLA's lamentable performance in recent years in publishing its Annual Monitoring Report (AMR) based on the KPIs. It is **totally unacceptable** that the AMR for 2024-25 has not yet been published.*

### Annex B Town Centres

We **welcome** the review that has led to a slight reduction in the number of town centres in Annex B and the reclassification of some of them. But it is not clear that boroughs have been consulted about the changes, *and this should be remedied before the Draft Plan is submitted to the Examination Panel.*

### Annex C Green Belt Sustainable Locations

We acknowledge the lists of transport infrastructure in Tables C1-C3 as a starting point for analysis. *But we **cannot support** Policy PV7.*

### Annex D Transport Interventions

We note the lists in Tables D1 and D2, where the dates are largely speculative even if given, and there is no mention of costs, benefits or obstacles. But neither they nor Policy MBUL5 can provide a substitute for an up-to-date vision-based transport strategy, as required by the NPPF. *This should be remedied as soon as possible, preferably before the Draft Plan is submitted to the Examination Panel.*

### Annex E Brownfield Opportunity Areas (BFOAs)

As we have noted in our introductory comments on Chapter 1 and in our responses to Policy PV1, the 30 BFOAs will have to play a major role in delivering the housing target. The figures presented in the sketches in this Annex suggest over 400k homes in total, though the timetable for delivery is unclear. But most of the existing BFOAs have been in existence for more than a decade, and there has been no systematic review of their progress, or of the lessons learned over an extended period. *There must be a **review of the figures and timescale** for each of the BFOAs and it should include consideration of existing and potential social and transport infrastructure of all relevant kinds.*

### Annex F Public Service Infrastructure

We are puzzled by this Annex and Table F1. We cannot find anywhere in the Draft Plan any reference to this kind of infrastructure, and how its needs will be met. As we note in our comments on Chapter 1 of the Draft Plan, *we believe this is a **fundamental omission**, which must be rectified before the draft London Plan is submitted to the Inspection Panel.*

## **Annex G Strategic Industrial Locations**

We note that this list is likely to change over the next five to ten years as a result of Policy PV5 and other policies in the Draft Plan.

## London Forum Response Appendix A

### The Draft Plan's Approach to Addressing Housing Need

1. The London Forum has major concerns about the evidence base and the assumptions made in assessing housing need in London, and the housing targets that form such a central part of the Draft Plan. As we show below the ONS and GLA population projections, the assessment of housing need in the Strategic Housing Market Assessment (SHMA), the Strategic Housing Land Availability Assessment (SHLAA) and the Viability Assessment are all seriously flawed. They cannot be regarded as a sound basis either for the overall ten-year target of 558k new homes, or for the components - tenure mix, size mix, and targets for individual boroughs - that underlie that target.

#### A. Population

2. The Draft Plan is rightly based on assumptions about the growth of London's population. Accurate estimates of population and household numbers, and projections of their growth, however, are difficult, particularly in areas where there are high levels of migration. But a key problem for the Draft Plan is that both the ONS and the GLA's estimates and projections of London's population have proved over several years to be fundamentally unreliable, as has been acknowledged in a recent blog by a GLA demographer.<sup>5</sup> In the years since the 2011 census the ONS and the GLA have systematically overestimated London's population, and its projections have similarly shown rates of growth much higher than have actually been achieved.
3. Projections have therefore repeatedly been reduced by substantial margins to deal with earlier overestimates: the projections from ten years ago for 2024 were more than 550,000 higher than the ONS's own estimates of London's actual population published recently for both 2024 and 2025. Although ONS has tried to address these issues since the inherently problematic 2021 census, its July 2026 estimate for London's mid-2025 population shows a 0.3% decline compared with 2024. And as GLA demographers have shown, the estimates and projections for individual boroughs are likely to be out by tens of thousands.<sup>6</sup> Both ONS and GLA projections must be regarded as subject to wide error margins, as recognised in the GLA's several variants, with differences between high and low variants of over 300k in population by 2036, and over 700k by 2046. Some variations are of course to be expected; but the claim in the Plan's Overview (para 1.9) that London is expected to have a million additional residents by 2046 **cannot be treated as sound**. Rather, we can expect to see over the plan period a repetition of the unforeseen changes in each of the key elements of population growth – the balance between births and deaths, and between inward and outward migration, both domestic and international – that we have seen in the last fifteen years. And changes in any one of those elements can have major implications

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<sup>5</sup> Ben Corr, *ONS 2022-based Subnational Projections*: <https://data.london.gov.uk/blog/ons-2022-based-subnational-projections>

<sup>6</sup> Ibid.

for the services required to meet the needs of London's population as a whole, as well as those for individual boroughs.

4. The consistent overestimates of population growth over recent years therefore indicate that the current projections should at best be treated with extreme caution. They are likely to be wrong. It is crucial, therefore, that boroughs are given the flexibility to allow them to address different kinds of unforeseen change in their localities. But the projections play a significant part in setting the housing targets set in the Draft Plan. As we show below, there are further major problems in how those targets have been determined, which raise critical problems for the Draft Plan as a whole.

## **B. Housing**

5. Housing is the key priority in the Draft Plan. We would normally expect the policies and targets in the Plan to be based on the *Strategic Housing Market Assessment (SHMA)* and also the *Strategic Housing Land Availability Assessment (SHLAA)* which is itself strongly linked to the separate *Viability Study*. But the SHMA published alongside the Draft Plan was clearly written before it was decided that the housing target set in the Draft Plan should be the 558K over the period 2027-2037 produced by the SHLAA, rather than the Government's target of 850k. The SHMA had been framed to meet the higher Government target, and then had to be hastily amended in an Addendum - using the crude method set out in paragraph 9 of simply altering the household formation rate - to make it agree with the lower 558k target. That is, to say the least, unfortunate, and it has a profound and totally unexamined impact on the tenure and size mix targets. It should also be noted that the reasons given in paras 1.19-1.22 of the Draft Plan for the reduced target (which for reasons given below we believe is itself unlikely to be met) are quite different from the factors analysed in the SHLAA, with no weighting or numbers attached to any of them.
6. The SHMA and its Addendum thus present us with two sets of target figures which should both be regarded as based on faulty methodologies and probably false. The SHMA is seriously flawed for the following reasons
  - i. First, as we show in our Appendix A, the population estimates and projections it uses are fundamentally unreliable, at London and borough levels. Worse, it treats population growth as exogenous. While acknowledging that growth might be closely related to housing supply, it does not attempt to model that relationship. Therefore it does not examine how the population projections used as an input are themselves shaped by the housing shortage the report is trying to measure on the one hand, or how increased housing supply might attract more inward migration on the other.
  - ii. Second, its methodology does not begin to fulfil the purpose of providing an assessment of London's housing needs. It uses two methods: the Government's Standard Method, and a Demographic Modelling-Based Method (DMBM).
    - a. The Standard Method, however, does not provide an assessment of *need*: rather, it produces a housing *target* based on a) existing stock, and b) an assessment of affordability based on earnings data that the ONS admits is unreliable and is not even related to resident location. Neither of these factors even attempts to measure housing need; they are simply very

approximate proxies. Any claim that the Standard Method assesses need is straightforwardly false. Moreover, the Standard Method takes no account of constraints on land availability, and it tells us nothing at all about size and tenure of homes needed.

- b. The DMBM does at least attempt to assess need, although as noted above, the demographic data is unreliable. But the SHMA seeks to reconcile the two methods by making an arbitrary and completely untested assumption - rather, a prescription - that household formation rates should increase rapidly, returning to their 2001 levels.
  - iii. Third, the report thus rests on the decision to define "unconstrained need" as a return over ten years to the household formation rates last seen in 2001. It asserts (para 10) that 2001 was chosen because housing availability and affordability was 'better' in 2001 than now, but it presents no evidence on this, or why 2001 is a better benchmark than other years (1991, 2011?). This arbitrary assumption has two key effects.
    - a. It enables the SHMA to claim that the two methods converge and produce the same 880k 'headline' figure. But they do not converge; rather, they are artificially made to do so<sup>7</sup>.
    - b. It also has a dramatic effect in increasing the numbers and proportions of market sale and rent homes needed, and of one-bed units in the housing mix. Other assumptions would have reduced those numbers substantially, increasing instead the numbers and proportions of social rent homes, and of family-sized units.
  - iv. Fourth, the report fails to take account of or even to provide confidence intervals or sensitivity analysis for both inputs and outputs of its modelling.
    - a. Inputs such as the *English Household Survey* are noted as producing a margin of error in the breakdown of need, but this uncertainty is never quantified around either the headline figure or the breakdown by tenure, size and so on.
    - b. The four scenarios outlined vary by a factor of nearly four (22,500 to 89,300), but there is no sensitivity analysis showing how much the figures move under different migration assumptions, benchmark year choice, or changes in affordability ratios.
7. There are further problems with the analysis of affordability. The SHMA provides analyses in real terms of earnings and of rent affordability, but it does not provide any analysis of house prices in such terms. Instead, it presents the average price of £556k in May 2025 as a nominal "27% increase compared to a decade ago". The average price of course conceals the readily-available data showing considerable differences in the movement of prices in different parts of London. Just as important, the omission of any real terms analysis of house prices is most regrettable, and seems to be part of

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<sup>7</sup> The arbitrary nature of the assumption is highlighted when in the Addendum to the SHMA, the household formation rate is changed to enable the housing targets to be reduced from 880k to 558k.

a highly-misleading attempt to frame London's housing crisis in terms of rising prices. The reality is far more nuanced than that.

8. The pattern of house prices in real terms since 2010 is complex. From 2010 to 2015 inflation was low, and average house prices rose by 40-45% in real terms. But since 2016 prices have declined in real terms in most parts of London, interrupted only by a short-lived rise during the pandemic stimulated by stamp duty holidays and other measures.
9. The short-term pandemic rise was soon consumed by inflation (which peaked at 11%), and since 2022 even nominal prices have fallen each year, the most sustained decline in the London market since at least the 2008 financial crisis. The fall in real terms has been even more marked, though since earnings growth has been relatively flat, affordability has hardly improved.
10. Real terms analysis thus shows that most of the increase in house prices across London occurred between 2010 and 2016. Even though the accumulated affordability problems have not been fully unwound in the years since then, there is no evidence of a continuing worsening trend. The level of intervention needed is thus likely to be much less than is suggested in the SHMA.
11. The pattern of affordability in the much-enlarged private rental sector is quite different. The SHMA analysis of affordability – real rents divided by real earnings – shows real rental affordability improving modestly in 2020–2022 before deteriorating sharply as rents surged in 2023, even as *house prices* were falling. Thus the affordability crisis of the 2010s for house *purchasers* has since 2022 been superseded by an affordability crisis for *renters*.
12. In short, the analysis above shows that London's housing crisis is focused much more than is suggested in the SHMA among renters rather than home-owners and potential purchasers. The crisis is one of affordability in the private rental sector and of lack of homes for social or intermediate rent.
13. All these problems are significantly worsened by ill-thought-through Addendum, with its dramatic and unexamined changes to targets for housing mix by tenure and by size.
14. For all the reasons set out above, all the SHMA's outputs cannot be treated as other than speculative. Rather, they should be treated at best as estimates within a wide range. We comment on more specific issues arising from the SHMA in our responses to the policies set out in Chapter 3.
15. The SHLAA is similarly flawed in its methodology and assumptions.
  - i. First, the link between viability and availability plays a central part in the study. We return to the findings of the separate *Viability Study* below. But where the viability of typologies in the Optimisation Framework is shown to be problematic, the SHLAA simply uses unevidenced discounts of up to 90% on the one hand, while on the other employing a similarly-unevidenced improvement in viability to be expected from 2032. It also assumes that there are no problems with permissions already granted.

- ii. Second, the conclusions on the availability of small sites depend on using the 75<sup>th</sup> percentile of the best three recent years, and then adding a 25% uplift to take account of the promised small sites design code and the assumed take up of LDOs by each borough. In short, an aspirational target is put on top of a highly-optimistic benchmark.
  - iii. Third, the Green Belt figures are based on a series of optimistic assumptions including build-out rates in New Towns from the 1950s and 1960s, achieved under wholly different circumstances.
  - iv. Fourth, no confidence intervals or scenario ranges are presented around the core 10-year figure, even though the sensitivity analysis for the longer-term shows high levels of uncertainty. The methodology as a whole does not provide robust support either for the overall figure or for the key components within it.
16. The findings of the *Viability Study* itself are in many cases highly questionable, particularly for Bands A-C and Green Belt release, where viability conclusions depend on large subsidy and an assumption of large CIL discounts. More generally, the conclusions depend on the cherry-picking of optimistic assumptions about high growth in sales and their value combined with declining cost inflation. These assumptions lead to indicative results that are then used to assess fixed (not indicative) 20%, 25% and 35% thresholds for affordable housing. It must be open to question whether those policy thresholds are the right ones, or even achievable.
17. Overall, therefore, the SHMA, the SHLAA, the Viability Study and the Draft Plan provide different housing targets, each based on wholly unsatisfactory methodologies. We share a widespread consensus that even the 558k target is not feasible and therefore extremely unlikely to be met. Yet this target affects nearly every aspect of the Draft Plan, especially but not solely the policies set out in Chapters 2 and 3. This is not a sound basis on which to build a London Plan. *It is critical therefore that in the rest of the process leading up to final approval of the next London Plan, the target – and the components from which it is made up, including the sub-targets for different housing tenure, housing size mix, and for each borough – are rigorously reviewed.*
18. We acknowledge that the issues we raise about the overall housing target and its sub-targets, and about the need to focus on the need for low-rent housing rather than market housing, raise issues that go beyond the remit of the London Plan. As the Overview in the Draft Plan acknowledges (para 1.22) significant increases in funding will be needed to meet even the reduced target for affordable housing set in the draft for the next ten years. But the problems are more serious than that.
19. The problems stem from the fundamental failure of a disastrous housing model introduced in the 1980s which relies on funds from private housing developments to subsidise the building of affordable housing, and more particularly of housing for social rent. It has given rise to a calamitous shortage of social housing, levels of homelessness that are catastrophic for the individuals and families involved, ruinous levels of expenditure for councils in meeting the costs of housing those people in temporary accommodation, and similarly huge expenditure for central Government in subsidising landlords rather than building houses. The effects have been hugely damaging across the whole housing sector: repeated affordability crises for

purchasers and renters in the private sector, the constant problems with an increasingly complex viability regime, and above all a failure to build the houses that meet the needs of London's diverse communities, to sustain those communities and allow them to grow.

20. The London Plan cannot solve these fundamental problems. But *a failure to identify and to examine closely the precise nature and causes of the problems, relying on faulty methodologies, false assumptions and partial, misunderstood data, will continue to engender policies that have had, and will continue to have, highly damaging and long-lasting consequences for everyone who lives and works in London, or who legitimately wishes to do so.*

## London Forum Response Appendix B

This Appendix sets out other structural and other issues we believe should be addressed in the drafting of the Draft Plan. The published London Plan is a free-standing document that should be well-written, self-contained and easy to read. Our recommendations below are designed to achieve that.

First, we deplore the **sparse use of cross-referencing** in the Draft Plan. We believe that it should be made much easier for readers to identify the key policies on broad issues that they wish to address; and to be reasonably sure, without having to read the whole Plan, that they have not missed policies that are relevant to their concerns.

Second, we suggest that for similar reasons there should also be much greater use of **cross references to relevant sections of the NPPF**. Of the 52 policies we can find slight references to the NPPF, in only eight of them, and direct reference to specific NPPF policies in many fewer than that.

Third, we cannot understand why footnote references do not make use of **hyperlink format**, and why in some cases such as footnote 123 on page 242, they refer to a broad corpus of evidence rather than to evidence more specific to the issue in hand.

Fourth, the Draft Plan makes liberal use of **abbreviations and acronyms**, and we have no quarrel with that. But too often those abbreviations are not spelt out at first use, or at all. As an example of the former, there are fourteen references to 'LGIF' but not until the sixth one on page 182 is it explained in a footnote. And it is unforgivable that at least half of them are not included in the Table of Abbreviations on pages 256-258.

Fifth, there is repeated misuse in the Draft Plan of the word '**only**', as in MBUL3 Clause B on page 39: "Isolated tall building(s) should only be considered where they clearly mark....." Placing 'only' before a verb rather than before the specific phrase or clause that it is intended to limit causes confusion and scope for debate about what a sentence actually means. Perhaps the worst example is in line 1 of Box PV7c, where the 'only' is separated by more than 20 words from the clause it is intended to limit. There are many other examples.

Sixth, we have suggested a few, far from comprehensive, additions to the very limited **Glossary**. We believe that all specialised planning terms should be explained in the Glossary.

### Typos and minor points

Typos and similar mistakes are perhaps inevitable in a draft, and the following list (which is far from comprehensive) is intended to be helpful, not as a criticism. We imagine that many of them may already have been picked up.

Page ii. Misalignment of page reference to MBUL10

Page 3. Para 1.1 Delete 'draft' in line 4

Page 7 para 1.9 line 1. Delete 'additional'.

Page 15, footnote 19. ‘the need to create value, crime and security threats, and significant inequalities’ needs to be redrafted. Creating crime and security threats is not a good idea.

Page 18 Figure 2.2. Crossrail 2 is included in this 20–year map, although its date has now been put back to 2050+ as shown in Annex D.

Page 24. MBUL1 Clause B, line 1. This should be amended to read ‘Local Plans should plan to deliver at least the net number of new homes set out in Table 3.1. Line 4, missing space between HN1 and Increasing.

Page 26 para 2.13. The definition of safeguarded land as drafted would cover *any* land that is not formally allocated.

Page 29 MBUL2 Clause B3 line 2. ‘12m up to but excluding 30m in height’ is at best confusing.

Page 30 footnote 20 line 1. Delete ‘an’.

Page 37 MBUL3 Clause A3. For Figure 2.7, read Figure 2.8

Page 37 MBUL3 Development Management Policy Clause A should be Clause B (and consequently Clause B on page 39 should be Clause C)

Page 39 MBUL Clause B. Insert ‘s’ after building.

Page 41 para 2.48, line 4. Delete ‘deemed appropriate’.

Page 47 bullet 4 at top of page. For GHR4 read GHR5.

Page 75 Missing page number

Page 76 Key under BLG Green Belt Residential-led. Add 65 Dagenham

Page 79 para 3.15 line 7. Missing apostrophe in Table3.1’s

Pages 89-90. Missing page numbers

Page 90 para 3.44c for 1 and 2 read a and b.

Pages 92-93. Missing page numbers

Pages 120-122 Figure 4.1. The criteria for omitting some but not all the BFOAs is not clear and should be explained

Page 127 GLE2 Clause F. It would be helpful if a footnote could direct readers to the definitions of the Use Classes.

Page 165 para 5.10 line 4. Delete ‘draft’

Page 168 para 5.19 line 2. Delete ‘draft’

Page 198 footnote 99. Remove underlining under UK Air

Pages 218-220 Figure 6.2. Experience Economy Clusters 32 (Vauxhall) and 37 (Wigmore Street) are wrongly placed on the map

Page 223 PV3 Clause B 1 line 2. Missing comma after ‘frontages’

Page 224 Footnote 120 line 1. Delete ‘draft’

Page 230 PV5 Clause B. Insert spaces in ‘Developmentforhousing’

Page 236 Clause PV7 Clause B. Insert 'is' after BLG.

Page 237 Box PV7A Clause 3c line 1. Insert space in 'thesite'. Transpose the words 'either' and 'utilise'.

Page 241 Figure 6.5 Title. Missing word after 'industrial'