

Draft London Plan 2026

Submitted by: The Highgate Society

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Introduction and summary

The Highgate Society is a local amenity society working to make Highgate and its surrounding neighbourhoods better places to live and work. We protect and improve the area's historic environment, green spaces and public realm, and address local traffic and transport issues – while supporting good development. Our response draws on our members' professional expertise and extensive experience of scrutinising planning proposals and contributing to planning policy across two boroughs, informed by detailed local knowledge and the concerns of our communities.

We recognise the urgent need for genuinely affordable homes, particularly Social Rent and family-sized housing. However, we question whether the Draft London Plan's housing targets are supported by sufficiently robust evidence and realistic delivery assumptions. The goals for genuine affordable homes must be achievable. Housing numbers alone are not a measure of successful growth: development must meet identified needs and be supported by infrastructure, public services and high-quality neighbourhoods.

Our principal priorities are to:

- **Make growth deliverable:** link its scale and timing to cumulative infrastructure capacity, identified funding and realistic delivery milestones, including healthcare, education and other public services.
- **Ensure methods of delivering housing are achievable** – much current development has been delivered by volume house builders which works in a robust housing market however alternative methods in a weak market should be identified and acted on.
- **Deliver the homes Londoners need:** prioritise genuinely affordable and family-sized homes, protect existing social housing and communities, and prevent delivery exceptions from weakening affordable housing requirements.
- **Retain a plan-led approach to height and density:** establish suitable locations and heights through evidence and consultation, respecting local character, heritage, infrastructure limits and neighbouring amenity.
- **Protect heritage, green space and neighbourhood quality:** assess cumulative impacts, integrate heritage considerations early in design, safeguard the Green Belt and Metropolitan Open Land, and restore London-wide basement safeguards.
- **Secure practical implementation:** strengthen community participation, inclusive design, transport and construction management, and monitoring, with clear responsibilities and corrective action where delivery falls short.

We welcome several provisions, including those addressing inclusive access, Healthy Streets, housing quality, circular economy principles and the protection of employment and community uses. Our detailed response seeks targeted improvements, retaining London-specific safeguards where national policy does not adequately replace them. The Plan should provide a credible framework for appropriately located development that meets housing need while protecting the environmental, social and economic qualities on which London's long-term success depends.

Chapter 1: Overview of the Plan and Good Growth objectives

We recognise the urgent need for genuinely affordable homes. However, this chapter does not adequately demonstrate that the proposed 558,000 homes over ten years can realistically be delivered alongside the infrastructure, public services, environmental and heritage safeguards necessary to support them. We have substantial concerns about the robustness of the supporting evidence and the soundness of the resulting strategy.

Paragraphs 1.16–1.25 acknowledge significant dependencies on infrastructure investment, funding, market demand, construction capacity and delivery models. These must be reflected in a credible housing trajectory, with clear consequences where essential conditions for delivery cannot be met. Heritage, local character, health, open space and the needs of existing communities must shape the strategy, rather than become safeguards weakened to achieve substantially higher housing targets.

1. Explain and test the housing delivery assumptions

Requested amendment: Explain how assessed housing need, identified development capacity and realistically achievable delivery relate to one another. Set out the demographic, housing-capacity and viability evidence supporting the ten-year target, together with assumptions about market recovery, build-out rates, public investment and infrastructure. Test reasonable alternative scenarios, including slower recovery and delayed investment, and explain their implications for the scale, timing and distribution of growth.

Reason: Identified capacity is not the same as homes that can be completed within the Plan period. Paragraph 1.19 recognises the risks of unrealistic targets; the proposed strategy must demonstrate that it has addressed those risks.

2. Link growth to deliverable infrastructure and public services

Requested amendment: Explain how existing deficits and cumulative demand will be assessed with boroughs and relevant providers. Identify critical improvements, responsible bodies, funding dependencies and delivery milestones, covering transport, utilities, flood protection, healthcare, education, early years, social care and community facilities. Distinguish committed provision from reasonable longer-term assumptions. Where essential capacity cannot reasonably be delivered, reconsider the scale, distribution or phasing of growth.

Reason: The London Infrastructure Framework, published in March 2026, focuses on economic infrastructure. It does not provide a comprehensive delivery framework for healthcare, education, social care and other community services. Chapter 1 should explain how the planning and funding of these services will be coordinated with the housing strategy, so that necessary provision is available when development creates additional demand.

3. Connect affordable housing ambition to delivery

Requested amendment: Explain how the longer-term ambition for 50% genuinely affordable homes will be delivered, including Social Rent and family-sized homes. Identify the contribution expected from public funding and different delivery models, principal funding dependencies and how shortfalls will be addressed. Monitor homes actually delivered by tenure and size, including reductions in affordable provision after on principal permission.

Reason: Overall housing numbers do not demonstrate that the needs of Londoners are being met. Paragraph 1.22 acknowledges funding constraints, but the strategy needs a clearer explanation of how affordable housing ambitions will translate into delivery.

4. Make neighbourhood quality and environmental limits shape growth

Requested amendment: Strengthen Table 1.1 and its supporting text to explain how heritage significance and settings, local character, inclusive access, health, amenity and accessible green space will shape development. Make protection of Metropolitan Open Land explicit. Ensure cumulative effects, including infrastructure pressures and heat risk, inform growth assumptions and consideration of reasonable alternatives.

Reason: Transport connectivity alone does not establish that a location can accommodate a particular height or density. The strategy must take account of heritage significance and settings, local character, and the environmental and social capacity of places when determining the appropriate scale and location of growth.

5. Strengthen participation, cooperation and monitoring

Requested amendment: Commit to early, inclusive community participation, supported by accessible maps and illustrations of likely neighbourhood change. Explain how cooperation with neighbouring areas informs the strategy. Establish monitoring of housing delivery, affordability, infrastructure and neighbourhood quality, with clear triggers for corrective action where critical assumptions fail.

Reason: Communities and delivery partners need to understand how the strategy will affect their areas and how it will respond if anticipated investment or development does not materialise.

Chapter 2 – Making best use of land and achieving Good Growth

MBUL1 - Spatial strategy

We support making effective use of land and ensuring that development is supported by adequate infrastructure. We seek amendments to ensure that cumulative infrastructure capacity and deliverability inform the appropriate scale, distribution and phasing of growth, and to remove the general early-phase exception to the prioritisation of affordable housing and public transport improvements.

NPPF 2026 retains important infrastructure and viability provisions. Our requests focus on the practical operation of London's spatial strategy: how growth responds to essential infrastructure capacity shortfalls, and how to prevent delivery flexibility from weakening applicable affordable housing requirements.

1. Make cumulative infrastructure capacity govern scale and timing

Adopted D2 B addressed the combined infrastructure demands of development, while D2 C required reconsideration of development scale where necessary additional infrastructure could not be delivered. MBUL1 A(3) already requires infrastructure sufficiency. It should explain how cumulative demand will be assessed and what follows where essential capacity cannot reasonably be provided. Separate assessments of individual proposals may miss pressures on shared networks and services.

National policy provides cumulative transport and sector-specific infrastructure safeguards. MBUL1 should bring these together across relevant infrastructure types, allowing reasonable longer-term assumptions under NPPF PM14(3). The purpose is to inform deliverable growth and its phasing.

Requested amendment: Strengthen A(3) and B(5) to require a proportionate, coordinated infrastructure delivery framework for strategic growth areas, prepared with relevant infrastructure providers. Assess existing deficits and cumulative demand from major schemes and small-site intensification, covering transport, utilities, flood-risk measures, healthcare, education, social care and other community infrastructure as relevant. Identify essential improvements, critical dependencies, responsible providers, funding sources and delivery milestones, and explain how delivery will be monitored. Use this evidence to determine the appropriate scale, distribution and phasing of growth. Where necessary capacity cannot reasonably be delivered, reconsider the scale or phasing of development. For infrastructure required towards the end of the plan period, demonstrate reasonable delivery assumptions based on adequate engagement with providers.

2. Delete the early-phase exception and constrain delivery flexibility

MBUL1 A(5) allows exceptions to A(4)'s prioritisation of affordable housing and public transport improvements. Paragraph 2.17 expressly envisages early-phase PBSA and large-scale purpose-built shared living without their applicable affordable housing requirements

to improve scheme value and deliverability. It does not expressly require any resulting affordable housing shortfall to be recovered in later phases.

This introduces additional flexibility that risks reducing or deferring affordable housing provision without clear safeguards. NPPF DM5 provides for viability assessments in justified circumstances, while PM12(4) requires plans to specify when viability review mechanisms apply and how and when viability will be reassessed. Neither provision requires a separate general early-phase exception. Any justified departure from affordable housing requirements should be considered through the relevant housing policies and applicable viability and review procedures.

Requested amendment:

Delete MBUL1 A(5) and the corresponding passage in paragraph 2.17 envisaging early-phase specialist housing without its applicable affordable housing requirements. Clarify B(8) and paragraph 2.17 so that optimising value generation and delivery through phasing, use and housing mix does not provide an independent justification for departing from applicable affordable housing requirements. Local plans should explain how delivery flexibility will remain consistent with those requirements and secure essential infrastructure when needed. Any proposed reduction in affordable housing should be assessed through the relevant housing policies and applicable viability and review procedures.

These amendments should clarify London's spatial strategy without duplicating national decision-making policy, consistent with NPPF PM6(1)(c).

MBUL2 - Optimising the use of land and site capacity

We support the London Forum's submission points.

Again, **we support the general thrust of this policy**, and also 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. *These problems must be remedied as a matter of urgency.*

11. 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 believe that it should be road-tested with potential users.*

- a. Our experience is that many sites do not conform to the parameters a to d 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 density 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. Nevertheless, we welcome the reference (in paragraph 2.24) that the density range refers to net residential 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 includes some transport improvements that have not been implemented. There should be at least a footnote on page 30 to more information about SAM, a link to a map which can be used to identify and interrogate the use of SAM in individual locations, and a Glossary entry for SAM which refers to the detailed report on SAM listed in the Evidence for Chapter 2.

12. 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 development 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 do not include ‘relevant density, height or other capacity guidance’. The OA descriptions in Annex E indicate that a high proportion are dependent upon 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.

13. 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.*

14. 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 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 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.*

15. Fifth, it is acknowledged in para 2.29 that the London Context Map provides only 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 believe that: *a. Clause A.2 should be strengthened so that at the 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. This is a major failing since acceptable densities are dependent upon accessibility and connectivity.

16. 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. We note, however, that the draft Code at several points uses a mandatory ‘must’, which is normally used only when referring to

statutory requirements. *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.*

17. 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.*

18. 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 believe that it should be addressed in the Plan.* 19. Finally, we are concerned that *neither this nor any other policy in the Draft Plan meet the requirements of NPPF Policy P1 to address pollution 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

MBUL3 must provide a clear, evidence-based framework for locating and assessing tall buildings while protecting London's historic environment, skyline, local character and neighbourhoods. The Draft introduces greater flexibility but does not retain all the safeguards in the adopted London Plan. Strengthening these safeguards is essential to ensure that the location, height and design of tall buildings are determined through robust planning evidence, meaningful public consultation and proper consideration of their impacts.

1. Retain the plan led location requirement

Adopted London Plan Policy D9 B(3) states that tall buildings should only be developed in locations identified as suitable in development plans. Draft MBUL3 B(3) introduces a route for tall buildings outside identified locations. This weakens the plan-led approach, risks encouraging speculative applications and undermines borough assessments and public consultation on where tall buildings are appropriate. Identifying suitable locations through plan-making allows heritage significance and settings, townscape, local character and infrastructure capacity to be assessed strategically, rather than primarily through individual applications.

Requested amendment: Delete MBUL3 B(3) and the corresponding outside-location provisions in Box MBUL3A and supporting text. Retain the requirement that suitable locations are identified through development plans. Additional locations and changes to designated boundaries should be established through plan-making, supported by appropriate evidence and public consultation.

We also seek deletion of Clause C's provision for isolated tall buildings. Although an isolated tower is not necessarily outside an identified location, it can create an intrusive skyline feature without the coherence, appropriate transitions and cumulative assessment associated with a planned cluster.

2. Allow locally appropriate thresholds

MBUL3 establishes a 30m threshold for tall buildings and allows boroughs to set higher local thresholds, but does not expressly permit lower ones. Buildings below 30m can nevertheless have significant impacts on historic or predominantly low-rise neighbourhoods, including their character, townscape and heritage significance and settings. General contextual safeguards do not replace the specific scrutiny required under tall-building policies.

Requested amendment: Allow boroughs to define lower tall-building thresholds for particular localities where justified by proportionate evidence of local character, heritage significance and sensitivity to change. MBUL3's location and assessment requirements should apply to buildings meeting those thresholds. Clarify that a threshold determines when tall-building policies apply; it does not establish that a particular height is acceptable.

3. Require assessment of less harmful heritage alternatives

Adopted D9 C(1)(d) expressly required proposals causing harm to heritage significance, including through setting, to demonstrate that alternatives had been explored as part of a clear and convincing justification. MBUL3 does not retain this explicit requirement. Although national heritage policies provide important safeguards, they do not expressly reproduce this specific requirement for tall-building proposals.

Requested amendment: Where a tall-building proposal would harm the significance of heritage assets, including through their settings, require a proportionate assessment of reasonable alternatives in height, massing and layout. Applicants should demonstrate whether less harmful alternatives could deliver comparable public benefits and explain why the proposed form has been selected.

4. Restore comprehensive cumulative assessment

Adopted D9 C(4)(a) expressly required the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings to be considered both when preparing plans and assessing applications. MBUL3 retains some safeguards for individual impacts but does not reproduce this comprehensive cumulative assessment requirement. National policies address particular cumulative effects, but do not provide an equivalent integrated requirement specifically for tall buildings.

Requested amendment: Restore the substance of adopted D9 C(4)(a), requiring proportionate assessment of the cumulative visual, functional and environmental impacts of existing, proposed, consented and planned tall buildings, both when identifying suitable locations and when assessing development proposals. This should include effects on

heritage significance and settings, local and strategic views, neighbourhood amenity, public spaces, and infrastructure and service capacity.

Assessment findings should inform the location, height, massing and design of tall buildings, with priority given to avoiding or minimising adverse cumulative impacts. Supporting text should clarify that assessments must consider relevant consented but unbuilt developments and other reasonably foreseeable tall buildings, rather than relying solely on the existing skyline. The scope of assessment should reflect the likely cumulative impacts, including effects at different viewing distances, pedestrian-level conditions, transitions to lower-rise areas and open spaces, servicing, peak-time activity and local transport capacity.

5. Justify metropolitan locations and their public benefits

Table 2.2 identifies 17 metropolitan locations for tall buildings, which boroughs are required to incorporate under MBUL3 A(3). Although A(4) requires locally evidenced boundaries and heights, the Plan should demonstrate why each strategic designation is justified, including the potential public benefits and why buildings of metropolitan scale may be appropriate. Strategic identification should not predetermine the outcome of detailed local assessment.

Requested amendment: Publish the evidence supporting each metropolitan designation, including its potential public benefits and how borough assessments and consultation have informed the selection of locations. Clarify the practical implications of the three cluster tiers, particularly for appropriate heights, density and townscape impacts. Boroughs should retain the ability to exclude unsuitable areas within metropolitan locations, establish appropriate height limits and justify departures from strategic designations where robust local evidence demonstrates that metropolitan-scale development would be inappropriate.

MBUL4 Utilities – capacity, connectivity, and resilience

We support the London Forum’s submission points.

24. We **support** this policy, but we *suggest 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.*

25. 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 to enable London’s growth

The scale and timing of development must be supported by deliverable transport capacity and safe, reliable services. MBUL5 identifies interventions and developer contributions, but should state more clearly how necessary improvements will be secured before development creates demand that the network cannot accommodate.

National policy retains important safeguards for cumulative transport impacts, transport assessments and travel plans. Our main requests concern infrastructure delivery, the practical management of construction, deliveries and servicing, and a comprehensive approach to congestion that protects accessibility.

1. Secure necessary transport provision in step with development

Adopted T4 D provides a specific safeguard where existing public transport capacity is insufficient, additional demand cannot be accommodated through active travel, and there are no firm plans and funding for necessary capacity improvements. MBUL5 does not expressly retain an equivalent requirement. Identifying transport interventions, particularly where funding or delivery is uncertain, does not establish that sufficient capacity will be available when needed.

Requested amendment: Require local plans and development proposals with significant transport implications to identify the transport infrastructure and services necessary to support development, together with delivery responsibilities, funding arrangements and realistic milestones. Ensure that development is phased so that essential provision is available when required. Where delivery is uncertain or delayed, require proportionate contingency measures, including alternative mitigation and appropriate restrictions on development or occupation. Where necessary transport capacity cannot reasonably be secured, reconsider the scale or timing of development.

2. Require construction logistics and servicing plans

Adopted T4 B expressly requires Construction Logistics Plans and Delivery and Servicing Plans, having regard to TfL guidance. MBUL5 addresses construction access, freight and servicing, but does not expressly retain these requirements. National policies address transport and construction impacts, but do not provide an equivalent explicit requirement for these plans. Without them, there is a risk that the combined effects of construction, deliveries and servicing on local streets will not be adequately managed.

Requested amendment: Restore the substance of adopted T4 B and T7 G by requiring Construction Logistics Plans and Delivery and Servicing Plans, having regard to TfL guidance and proportionate to the scale, complexity and likely impacts of development. Plans should address vehicle routes, timing, loading and unloading, cumulative activity and safe, accessible pedestrian routes, while protecting cycling and public transport operations. Require clear implementation responsibilities, proportionate monitoring and corrective measures where agreed arrangements fail to manage impacts adequately.

3. Manage congestion comprehensively and protect accessibility

We support reducing car dependency, improving public transport reliability and encouraging walking and cycling. However, restricting parking in new developments

cannot, by itself, address London's wider traffic pressures. Congestion also arises from existing traffic, freight and deliveries, taxis and private-hire vehicles, and journeys entering London. MBUL5's provisions for freight and servicing are welcome, but should form part of a coordinated approach addressing the principal sources of congestion and providing practical alternatives to car use.

Parking policies must also take account of accessibility, particularly where realistic public transport alternatives are limited and where residents' disability or mobility needs change over time. GHR11's disabled parking provisions are important, but arrangements should be sufficiently flexible to accommodate changing needs throughout the lifetime of a development.

Requested amendment: Strengthen MBUL5 Part A and Box MBUL5 to require a coordinated, evidence-based approach to managing congestion, addressing its principal sources alongside improvements to public transport, walking and cycling. Retain the parking standards requirement in B(3), but clarify in supporting text that parking restraint is one element of a wider congestion strategy and should be accompanied by effective measures addressing freight, deliveries, taxis, private-hire vehicles and other significant traffic sources.

Clarify that parking policies should take account of accessibility where viable transport alternatives are limited, and ensure that provision for disabled residents can respond to changing mobility needs over the lifetime of development.

4. Retain the requirement not to increase road danger

Adopted T4 F expressly required development not to increase road danger. MBUL5 C(1)(ii) requires danger to be minimised, while NPPF TR6(4) provides for refusal where highway-safety impacts would be unacceptable. Neither expressly reproduces the adopted London Plan's no-increase requirement.

Requested amendment: Restore the requirement that development should not increase road danger and should reduce it wherever possible, with particular attention to people walking, wheeling and cycling, children, older people and disabled people.

MBUL6 - High quality design for a growing, changing city

We support MBUL6's aim of securing high-quality design, its requirement for early independent design review and its attention to climate resilience. Its protection of local distinctiveness and application of the agent of change principle are also welcome. National policy substantially protects approved drawings, materials and design quality through completion. Our priorities are to establish the acceptability of major design elements before permission, ensure planning decisions explain how design review has been addressed, and strengthen community engagement and the practical application of contextual design.

1. Establish major design elements before permission

Adopted D4 F(3) requires authorities to avoid deferring assessment of the design quality of large elements of development to conditions or later approval. MBUL6 requires early consideration of amenity impacts and design review for referable schemes, while NPPF DP4 supports design scrutiny, clear approved drawings and protection against subsequent erosion of design quality. However, neither expressly retains the requirement to establish the acceptability of major design elements before permission.

Requested amendment: Establish the acceptability of major elements determining a development's design quality before granting permission, including the key principles governing its principal façades and landscape design. Information should be proportionate to the application stage, including for outline proposals, while sufficient to assess the scheme as a whole. Fundamental design questions should not normally be deferred to conditions or later approval. Where necessary to establish design acceptability, proportionate visual, environmental and movement assessments should inform consideration of reasonable design options, supported by relevant urban-design, conservation and other specialist advice.

2. Explain how design review informs decisions

Adopted D4 E(6) requires planning decisions to demonstrate how design review has been addressed. MBUL6 D requires applicants to explain their response, but does not expressly require the decision-maker's explanation. NPPF DP4(2)(a) requires consideration of review outcomes, without expressly requiring that explanation.

Requested amendment: Require the officer report or decision statement to explain how material design review recommendations have been addressed and give reasons where they have not been followed. Where successive reviews have taken place, consider the review history and explain the treatment of outstanding recommendations. Recommendations remain advisory; the purpose is transparent decision-making.

3. Strengthen community engagement and contextual design

MBUL6's contextual design and early design review requirements provide a useful foundation, alongside national policy's protection of approved design quality. However, specific safeguards in adopted Policy D4 should be retained: establishing the acceptability of major design elements before permission, explaining how design review informs decisions, and considering continuity of design expertise through completion. Proportionate assessments and specialist advice should support these requirements. Additional amendments should strengthen meaningful community engagement and ensure that design responds to local character, landscape, streets, open spaces, movement and everyday use.

Requested amendments to Part A

*Additional text required **marked in red**.*

A(1) Promote good design that reflects growth and change needs via the use of design codes and guidance in line with Policy MBUL2, prepared with meaningful engagement with local communities and relevant local organisations, informed by their knowledge of local character and place, and applied in a way that responds to local conditions and the relationships between buildings, streets, open spaces, movement and everyday use, rather than through the mechanical application of standardised forms.

A(3) Plan positively for contrasting uses to co-exist (side-by-side) and for mixed use liveable neighbourhoods through site allocations, spatial and design policies that incorporate appropriate buffering and transition sufficient to protect health, amenity, local character and the quality of the public realm, with such transitions designed positively in response to the surrounding landscape, public realm and patterns of movement.

Requested amendments to Part B

B(1) Enhance local context by delivering buildings and spaces that positively respond to local distinctiveness, by identifying the special and valued features and characteristics of the locality and using these to inform the proposal, including, where appropriate, through engagement with local communities and relevant local organisations, and with regard to the wider physical and social context, including landscape, movement patterns, public and open spaces, and the relationships between buildings.

B(3) Be of high-quality architectural design and demonstrate how the proposal achieves high-quality design through its response to local context, townscape, heritage, public realm and user experience, including the relationships between building form, outdoor space, movement, entrances, daylight and common areas. Relevant community views should form part of this assessment alongside professional design review.

B(5) Maximise active frontages onto the street, where appropriate to the local context, with the form and degree of activity at the building-street interface designed to respond to local character, use and human scale, in order to engender street-based activity and a sense of safety. Large areas of inactive frontage due to servicing areas/entrances and vents should be avoided.

Requested amendments to Part D

Development proposals that are referable to the Mayor should have undergone at least one independent design review early on in their preparation before a planning application is submitted. The design review process should be based on the principles set out in the London Design Review Charter, taking account of parts B and C of this policy. Inclusive design review and other specialist design review and advice may be needed. Applicants should show in the design and access statement how they have considered and responded to the design review recommendations. Independent design review should complement, and not substitute for, meaningful community engagement. Design quality should be informed by both professional review and local experience, with applicants demonstrating

how relevant community and user feedback has informed the proposal and explaining where it has not been accepted.

Requested amendments to paragraph 2.94

Developments that show a clear understanding of, and relationship with, the distinctive features of a place are more likely to be successful. These features include buildings, open spaces, public realm and the underlying landscape. Development should be designed to respond to, conserve where appropriate, and sensitively evolve the special characteristics of these features, **while retaining the relationships and qualities that make the place coherent, usable and distinctive.**

Supporting delivery safeguards

Adopted D4 F(4) asks authorities to consider securing the original design team's continued involvement to monitor quality through completion. Neither MBUL6 nor national policy expressly retains this option. For major or complex schemes, authorities should consider securing continuity of design expertise, through the original team or suitably qualified replacements, where necessary and proportionate.

Proportionate arrangements should also verify that planning-approved design, materials, façades, landscaping and relevant mitigation are delivered. Where justified, these could include independent checks at appropriate stages, reporting of departures and corrective action. This is an additional implementation measure, rather than a safeguard expressly required by adopted D4. It should focus on planning requirements and operate alongside building-control responsibilities.

MBUL7 London's heritage

We support MBUL7's recognition of London's historic environment and its archaeological screening requirements. NPPF 2026 provides substantial protection for heritage significance and settings. Our priorities are to retain explicit safeguards for cumulative incremental change and to ensure that heritage assessment shapes planning and design from the outset.

These safeguards are particularly important where successive developments affect listed buildings, conservation areas, historic landscapes and their settings. Targeted action for assets at risk and recognition of historic cemeteries are supporting requests.

1. Assess and actively manage cumulative heritage impacts

Adopted HC1 C expressly requires active management of the cumulative impacts of incremental change on heritage assets and their settings. MBUL7 does not reproduce this general safeguard. National heritage policies protect significance and require assessment of effects, but do not expressly reproduce the same general requirement across heritage assets.

Successive developments can erode heritage significance and the contribution of settings even where the effects of individual proposals appear limited. The London Plan should retain a clear requirement to assess and manage these combined effects.

Requested amendment: Reinstate the protections provided in Policy HC1C

2. Integrate heritage considerations early in planning and design

HC1 C expressly requires heritage considerations to be integrated early in design. MBUL7 does not retain an equivalent general requirement. NPPF HE1 requires heritage-informed plan-making; HE5 requires assessment of significance and effects. HE5(5) specifically links archaeological assessment to design, mitigation and implementation, while HE9(1)(b) requires conservation-area interest to be considered in design. These provisions do not expressly reproduce HC1 C's general early-design safeguard.

Heritage assessment should inform proposals while alternatives in scale, height, massing and layout remain available, rather than merely assess the effects of a design already settled. This also matters when identifying growth areas and preparing allocations, masterplans and design codes.

Requested amendment: Add to MBUL7: "Heritage considerations should be integrated early in plan-making and the design process. Proportionate assessment of heritage significance, including the contribution made by settings, should inform growth allocations and development proposals before key decisions on scale, height, massing, layout, demolition and intervention are settled. The assessment should identify opportunities to avoid harm and conserve, enhance or better reveal significance, and explain how its findings have informed the proposed approach."

3. Secure targeted action for heritage assets at risk

HC1 E requires boroughs to identify regeneration opportunities and set out repair-and-reuse strategies for assets at risk. MBUL7 B encourages local heritage strategies, while paragraph 2.98 describes repair and beneficial reuse opportunities in supporting text. HE1(1)(a) requires identification of assets at risk, their key issues and sustainable-development opportunities, but does not expressly require repair-and-reuse strategies.

Requested amendment: Add to MBUL7 B: "Where heritage assets are identified as being at risk, local planning authorities should identify opportunities and set out proportionate measures for their repair, conservation and appropriate reuse, working with owners, Historic England and relevant partners."

4. Recognise London's historic cemeteries

London's historic cemeteries, including the Magnificent Seven, combine landscape, architectural, archaeological and cultural significance. Their contribution should be explicitly recognised in the description of London's historic environment.

Requested amendment: Add "historic cemeteries, including London's Magnificent Seven" to paragraph 2.104.

MBUL - 8 Inclusive design

We support MBUL8's aim of creating an inclusive built environment and its retained requirement for evacuation lifts.

*Additional text required **marked in red**.*

1. Plan- making

A Plan-making authorities should ensure their local plans, area strategies, masterplans and design codes contribute to creating an inclusive built environment, **informed, where appropriate, by meaningful engagement with relevant end users, disabled people, protected-characteristic groups and access and inclusion organisations, so that lived experience contributes to the design of places from the outset.**

2. Development management

B (1) designed to respond to and accommodate the requirements of London's diverse population and **changing needs over time**, and be flexible to accommodate future requirements.

(2) are convenient and welcoming with no disabling barriers, providing independent and safe access and egress without additional undue effort or separation, **with inclusive access integrated into the principal routes, entrances and shared spaces of the development.**

C Where a design and access statement is submitted with a planning application it should include a section that demonstrates how the requirements of part B have been met.

Note: **Compliance with this essential element of the building process, particularly after Grenfell is vital and is frequently ignored.**

RATIONALE 2.114 it is important to consider the development's contribution to the creation of an inclusive built environment at the earliest possible stage in the development process, from initial conception through to completion and, where relevant, occupation and ongoing management and maintenance, **with the experience of users informing management and future improvements where appropriate.**

MBUL9 - Healthy streets and public realm

We support MBUL9's Healthy Streets Approach and its requirements for accessible routes, reduced vehicle dominance, shade, seating and safer public spaces. Its provisions for dockless-cycle parking, construction impacts, early public realm delivery and involvement of women and girls are welcome.

NPPF 2026 provides substantial protection for pedestrian priority, accessibility, social interaction and avoidance of unnecessary street clutter. Our priority therefore concerns London-specific Healthy Streets planning and assessment.

1. Plan and demonstrate locally specific Healthy Streets improvements

Adopted T2 B(1)–(2) required development plans to apply the Healthy Streets Approach and identify opportunities to rebalance street space. MBUL9 retains Healthy Streets outcomes but does not expressly reproduce this plan-making requirement. An explicit provision should complement MBUL5 and national transport policies by identifying local street and public realm priorities.

Adopted T2 D(1) also required proposals to demonstrate improvements supporting the ten Healthy Streets Indicators. Although MBUL9 requires impact assessment and refers to TfL guidance, this demonstration requirement should be retained expressly.

Requested amendment: Add a plan-making provision: “Local plans, area strategies and relevant masterplans should apply the Healthy Streets Approach to identify locally specific priorities, including opportunities to rebalance street space towards walking, wheeling, cycling, public transport and places to spend time. These priorities should be informed by proportionate evidence and community engagement, identify necessary interventions and establish appropriate arrangements for contributions and delivery.”

Strengthen Parts A and B: “Development proposals within the scope of this policy should demonstrate, proportionately to their scale and impacts, how proposed improvements support the ten Healthy Streets Indicators, taking account of TfL guidance and identified local problems and user needs.”

Chapter 3: Delivering the homes and neighbourhoods Londoners need

HN1 - Increasing London’s housing stock

3.1 The Society strongly disagrees with the need to deliver a significant number of new homes, particularly as the delivery of this quantum is likely to be damaging to the fabric of the city. Much of the proposed delivery is at the expense of existing employment, the green belt, amenity in existing estates, established communities and through the introduction of tall buildings.

The statement that London faces an unprecedented challenge to provide “*accommodation that is affordable and of varying types and tenures that can meet the broad needs of Londoners*” is welcome but the assumption that there will a need to provide a “*significant number’ of new homes*” does not sit well with this statement. The Strategic Housing Land Availability Assessment (SHLAA) is partly responsible for this, identifying unsuitable and damaging sites in order to meet artificially created housing targets.

It is gratifying that the Plan recognises that there are difficult and uncertain economic conditions which are currently preventing the provision of the “*significant number of new homes*” . The current response of the GLA has been to water down policies through the Mayor’s Emergency Measures to reduce affordable housing, increase density, reduce amenity space and infrastructure. This begs the question of whether we in danger of pursuing targets for housing at any cost which will not meet need or demand.

3.2. This is the section which deals with targets and is based on a statement that under clause 1.9 of Chapter 1, Planning for London’s Future that “*On past trends London is expected to add as many as 1 million more additional residents over the Plan period - growing to a population of over 10 million. A huge increase in housing delivery is needed to both accommodate future growth and address the chronic shortage of homes for existing residents.*” The Society disagrees with this statement most strongly. The government has

set the housing target for London over a 10 year period at 848,884 new homes, reduced to 558,000 by the GLA. This figure is based on an out of date evidence and is undeliverable.

Using targets is a crude numbers game which does not relate to need or demand. The issues with this are as follows:

- Requirement for 1 million new homes (see Chapter 1, clause 1.9) in London. This appears to be based on 2011 - 2015 figures produced by the Office of National Statistics (ONS) and the GLA which are now radically out of date. According to the ONS, the figures in mid-2025 show a decrease of 0.3% of the population. This clearly undermines the need for this quantum of new homes.
- Using targets based on the number of units created encourages the production of smaller 1 bed units to maximise the number of units produced within a development and meet the targets. See also response to policy HN7 below. What this plan should be looking at is bedspaces rather than numbers of units,
- The government, based on the out of date ONS predictions for population growth, have translated these into a requirement over 10 years for approximately 850,000 new homes for London which the GLA have reduced to 558,000.
- What London needs, if it is to continue as a viable entity, is more accommodation suitable for families units so that once someone reaches child bearing age, they do not have to move out. This is particularly noticeable in inner London boroughs such as Camden where the population has dropped by 1,9% over the last year and primary schools are closing all over the borough
- The Plan should examine whether high rise buildings are suitable for families. The predecessor of the GLA, The Greater London Council (GLC) in their 1967 Housing Subsidies Act, explicitly revised its operational guidelines during this period and by 1971, following widespread tenant dissatisfaction, both local and national planning guidelines fundamentally restricted placing families with small children in upper-floor high-rises. This does beg the question of what has changed since then where high rise is often the built form of choice.
- There is a considerable shortage of available building land as identified in SHLAA which has resulted in this clause a commitment to making the most of brownfield opportunities and ensuring that these opportunities have been maximised. However, they do also require the use of Green Belt land. The targets set down by the GLA are passed down to the boroughs who then have to find available sites through their Site Allocations. Experience of working through local plans are that many of the allocated sites are not suitable for additional housing. These include proposed sites which would result in substantial loss of employment, those that will be destructive in terms of amenity and biodiversity such as building on the Green Belt and infilling existing estates and those that are suffer from heavy noise and air pollution such as on major roads

3.4 – 3.9 These sections deal with affordable housing and the fact that its provision is essential. This is agreed but no solutions are offered nor are any solutions given as to how this will be provided. Further responses are given under policy no. HN3 below.

HN2 - Protecting and reshaping housing

This policy to protect housing that provides homes that people need is welcomed but the statement is not backed up by practice and this section shows little indication that the current haemorrhaging of existing affordable housing stock will be addressed. There are two main areas where on one side, opportunities to increase affordable housing stock are not taken up and others where actual loss occurs

Whilst clauses C (1), (2) and (3) are welcome they seem to contradict the opening clause in A(1) which seems to accept a low standard that developments should retain at least the same level of replacement social housing whilst C (1), (2) and (3) look at the wider implications of redevelopments.

Many developments involve the demolition of existing estates with established communities and only minimal, if any, gains in social housing provision. The most prominent of these is the example of the London Borough of Camden's Community Improvement Programme. In this case estates with established communities are being demolished and tenants rehoused with no guarantee of a return to the estate. They are replaced with a radical increase in density, including damaging high rise buildings with no resulting significant increase in affordable housing. The GLC worked hard to retain existing communities (the Swinbrook Experiment) which leads to social cohesion and a reduction in anti social behaviour but this now seems not to be an issue in current developments. It should be pointed out that a 50% affordable housing target quoted in C (3) does appear unrealistic.

The second form of protecting housing would be to abolish the Right to Buy on all properties, not just those less than 35 years old as proposed. Although it is recognised that the government is proposing that this is tightened up with proceeds of sale going to local authorities, this is not yet law and is still inadequate. There appears to be a political lack of will to abolish any Right to Buy and a failure to accept the damage this policy is doing to the social rented housing stock.

HN3 - Delivering affordable housing

This policy is thoroughly researched and delivered with its aim being to deliver affordable housing to contribute to meeting London's need as set down in London's SHMA. It is accepted that the area of greatest need is affordable housing, in particular social rent. However, this policy although thoroughly researched and presented is based on the existing systems of fast tracking and viability and the Society does not believe it will make any difference to the delivery of much needed affordable housing. See below.

Under A(1) the Plan making section of this policy, the basic premise is that affordable housing should make up 50% of any development. A(2) goes on to give numbers which at a total delivery of 367,450 units against 558,000 which gives 66%. There is a basic contradiction here.

However that being said, neither figures is deliverable unless there is a radical change in the methods of funding and delivery. The current system relies on volume housebuilders to deliver the large numbers of housing units needed to meet the targets but with proportionally low numbers of affordable housing. Although small scale developments occur all over London, these generally appear to be given less significance due to the fact that they do not make the same impact on target figures

The general consensus in the housing market is that 20% is the maximum that any developer will be willing to provide and any amount of legislation through the Plan will not change this. Developers need to make a profit to continue operating and, as the recent examples of developers Kier and Taylor Wimpey indicate, when that profit is not being made, they will leave the market. What seems to be missing in the Plan is any innovative method as to how the social housing could be provided.

Table 3.2 and 3.3 give the threshold levels of affordable housing to enable fast tracking through planning process. It is regrettable that the lowest threshold is going to be the Green Belt which will encourage development in these areas and is the most damaging in terms of amenity and biodiversity. It is also the area where the provision for infrastructure, in particular public transport, are their weakest. This will lead to increased car dependency which is contrary to the GLA/TfL's current active travel policies.

Part L of this section deals with Student accommodation and affordability. It is surprising to see this element here as the understanding is that the market for this has collapsed and that universities are no longer supporting this.

Clause 3.42 mentions affordable housing provision in terms of habitable rooms. This is contradicted by other sections of the plan where numbers are calculated in units. The Plan needs to regularise their position and if there are variants on the calculations of housing provision this should be explained.

HN4 Gypsy and Traveller accommodation

We support the London Forum submission points.

58. We **support** the policy, but we note that the targets in HN4 Table 3.4 are an amalgam of two different 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 the backlog of unmet need.*

HN5 - Managing specialist accommodation

We support the London Forum submission points.

59. We wish to highlight two problems with this policy. 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.

60. 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 bed spaces a year had 'been identified', it did not set borough targets. 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.

61. Thus while we support the provision of PBSA *we do not accept the ten-year target of 31.5k. 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 urge 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*

62. 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.

** The Highgate Society would also add Islington here*

63. 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 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.*

HN7 - Housing mix size

This is a short policy which adopts a pragmatic approach leaving considerable flexibility to the boroughs as to how they wish to allocate the mix, with a presumption towards smaller units in town centre locations and larger units for affordable housing. there does not appear to be a significant difference between this and the previous London Plan.

However, there are a couple of important caveats. We are aware of schemes currently being submitted for approval which include significant numbers of student housing units as well as market and affordable housing. When this is factored in with the existing mix the result is a very unbalanced consisting of 76% of studios and one bed units housing which is totally at odds with the Local Plan which prioritises 2 bed units and above . This does not provide a rounded community nor does it address housing need.

HN8 - Housing design

We support the London Forum submission points.

74. 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. 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).

75. 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 that the wording of Policy D6C (that they should normally be avoided) should be retained.

76. 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.

77. 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

We support the London Forum submission points.

78. We **strongly welcome** the much firmer set of requirements as compared to those in the 2021 Plan.

79. *We also welcome the noise performance standard for new homes in Clause C.*

80. *The recommendations on impact sound transmission and noise levels in paragraphs 3.117 and 3.118 should be part of the policy.*

Chapter 4: Growing London's economy in a way that benefits all

GLE1 Sufficient and appropriate employment space

1. Ensure larger developments consider smaller business units

Requested amendment: Restore the requirement in adopted London Plan Policy E2 D, updated to reflect current use classes: "Proposals providing more than 2,500 sqm gross external area of new office, research and development, light industrial, general industrial or storage and distribution floorspace, or exceeding a locally determined lower threshold, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises. This consideration should be informed by local evidence of demand and the intended use and operational requirements, without prescribing fixed unit sizes or proportions."

Development affecting existing employment space should retain or re-provide suitable, affordable premises for businesses that meet essential local needs, such as vehicle repair

workshops and builders' merchants. Provision should enable these businesses to continue serving their communities and sustain a diverse range of local jobs, including practical and skilled trades.

We support the London Forum submission point.

1. 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

We support the London Forum submission points.

84. We **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 and uses covering the possibility of industrial and other uses. We also note a strong tension between Clause F in 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.*

85. *Net reductions in industrial space should be avoided wherever possible. 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.*

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 sets out no 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.*

GLE3 - Datacentres

We support the London Forum submission points.

87. 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.

88. 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 policies in relation to them.

GLE4 - Night-time economy

Public houses should retain a standalone policy recognising their daytime and evening functions, community value and contribution to local heritage and character. Addressing them solely within a night-time economy policy gives insufficient recognition to their wider role as places for social interaction, community activities and local services.

Although GLE4 A(6) and B(4)–(6) retain important protections, several detailed safeguards in adopted Policy HC7 and its supporting text have been omitted. NPPF 2026 provides relevant protection but does not fully replace these safeguards. We therefore request the following priority amendments.

1. Restore robust marketing requirements

Restore the requirements of adopted paragraph HC7 7.7.7: marketing as a pub for at least 24 months, at an agreed price following an independent valuation, in a condition allowing continued pub operation, through appropriate publications and specialist agents locally and London-wide.

GLE4 B(6) requires compelling marketing evidence without specifying these requirements. NPPF HC6(1)(a) requires at least 12 months' marketing where commercial viability is an issue, but does not reproduce the adopted Plan's longer period or detailed safeguards. These are necessary to ensure that claims of no realistic prospect of continued pub use are properly tested.

2. Protect continued operation and viability while allowing appropriate development

Retain an express safeguard, drawing on adopted HC7 C and paragraph 7.7.8, against redevelopment of associated accommodation, facilities or land within a pub's curtilage that would compromise its operation or viability.

This should allow appropriate development above or alongside pubs where effective Agent of Change measures are secured and it is demonstrated that the development would not compromise the pub's continued operation or viability. NPPF P4(1)–(3) provides substantial protection against unreasonable restrictions arising from new development, but does not expressly address the loss of operational space, function rooms, staff accommodation or beer gardens on which a pub may depend.

3. Recognise pubs' wider community value

Restore the assessment criteria in adopted paragraph 7.7.6, including community use, rooms for hire, associations with sports clubs and provision for particular groups. Make clear that protection applies to valued pubs throughout London, irrespective of their opening hours or location within a night-time economy area.

Although GLE4 paragraph 4.46 acknowledges pubs' social and cultural function, it does not reproduce these detailed criteria. NPPF HC6(2) recognises pubs as community facilities, but its alternative routes for accepting loss under HC6(1)(b)–(c)—equivalent or better replacement provision, or sufficient alternative local provision—do not replicate adopted HC7 B's pub-specific marketing safeguard.

A separate pub policy should retain and strengthen GLE4 B(6)'s marketing safeguard and restore the detailed community-value criteria, ensuring that pubs are protected as enduring community assets as well as contributors to the night-time economy.

GLE5 - Culture and creative industries

We support the London Forum's submission points.

92. We support the generality of this policy, but the somewhat ham-fisted 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.

93. 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. We urge that this be made explicit in the Policy.

GLE6 - Visitor infrastructure

We support the London Forum's submission point.

94. 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 and to camping and caravan sites in Policy E10 in the current London Plan have been omitted. It is not clear why.

GLE7 - Affordable workspace

1. Secure effective management and monitoring

Requested amendment: Restore the substance of adopted E3 D within GLE7, expressly requiring Local Plan policies and Section 106 agreements to ensure that affordable workspace's intended social, cultural or economic objectives are monitored and achieved, supported by evidence of a workspace provider's long-term commitment. Although paragraphs 4.66–4.68 address delivery, management and monitoring, they do not fully reproduce this requirement, and the NPPF provides no specific equivalent.

We support the London Forum's submission point.

95. 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 urge 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 may result in scattered and unplanned provision.

GLE8 - Employment and Skills

We support this policy

GLE11 - Circular Economy

Overall we support the ambitious aims of this policy.

1. Restore an explicit requirement for accessible waste storage and collection

Adopted SI7 A(6) expressly requires adequate, flexible and easily accessible storage space and collection systems supporting the separate collection of dry recyclables and food waste. This practical safeguard is not expressly reproduced in GLE11 or GLE12.

Requested amendment: Require developments to provide adequate, flexible and easily accessible waste storage and collection arrangements, supporting the separate collection of dry recyclables, food waste and residual waste. Provision should be appropriate to the scale and use of the development and designed in consultation with the relevant waste collection service.

GLE12 - Waste

1. Clarify responsibility for the impacts of increased waste-management capacity

Paragraph 4.102 does not clearly distinguish between protecting existing waste operations from restrictions arising from new neighbouring development and assessing the additional impacts of intensification. Clarification is needed to ensure that references to Agent of Change and the evolving character of an area do not weaken the environmental safeguards applying to increased capacity, including the requirement for no net worsening of carbon and air-quality outcomes.

Requested amendment: Clarify paragraph 4.102 so that “established use intensity” encompasses both lawful current and permitted levels of operation, consistent with NPPF P4(3). State expressly that proposals to increase waste-management capacity must assess and address their additional impacts and comply with GLE12 F(4) and relevant amenity, pollution and transport requirements.

2. Clarify how cross-borough waste capacity will be secured

Paragraph 4.110 encourages boroughs to pool requirements and share surplus capacity. Although paragraphs 4.105–4.107 provide safeguards concerning site release and compensatory capacity, the arrangements for pooling and sharing capacity more generally are less explicit, particularly across waste-plan boundaries. Clearer arrangements would help demonstrate that reliance on capacity elsewhere is deliverable and that London’s overall waste-management needs will be met.

Requested amendment: Strengthen paragraph 4.110 to explain how boroughs should agree, record and monitor arrangements for pooling requirements and sharing surplus capacity, including through existing waste-planning groups. Clarify the role of these groups and how agreements should be reflected in participating authorities’ waste plans and monitoring. Where a borough relies on capacity elsewhere to meet its apportionment or other identified waste needs, it should demonstrate that the capacity is available, suitable and not double-counted, with arrangements to address any shortfall.

Chapter 5 – Creating a greener, healthier and resilient city

GHR10 - Air quality

Policies to improve air quality associated with construction are supported. However, it is disappointing the Plan does not also address the management and reduction of construction and environmental noise.

Additional Comment - Basements

We are extremely concerned about the removal of policy D10 of the adopted Local Plan which currently provides a level of London-wide safeguard for residents and, important guidance to boroughs in writing their own policies.

Paragraph 3.10.3 explicitly recognises the distinctive and potentially cumulative impacts of large-scale subterranean development and advises boroughs to establish appropriate basement policies where these are a local issue. It identifies ground and structural stability, flood risk and drainage, trees and biodiversity, archaeology and heritage, neighbour amenity, air and light pollution, construction traffic, noise, vibration and site waste as matters requiring particular consideration. There is no equivalent policy in the Draft London Plan and these matters are not collectively replicated by national policy. Its removal is not therefore, just an example of streamlining to merely eliminate duplication. In an environment where extensive densification and development of small sites is planned across London, there are likely to be many more basement excavations in new areas. To date, basements have generally been clustered in areas with relatively high property values and the boroughs in which this has happened, becoming aware of the problems which can arise and the harm which results, have developed their own policies, often in conjunction with each other. In light of current building proposals, policy D10 is more important than it has ever been. All London areas should be able to benefit from its advice and develop policies in advance of these problems, which once encountered can cause considerable delays in project delivery and considerable expense to put right.

The London Plan is intended to provide a strategic framework over many years and should protect Londoners from the particular and cumulative harm and misery caused by badly planned and/or constructed basement development. We therefore contend that rather than removing all London wide guidance currently available, the Draft Plan should include a strong London wide policy requiring all boroughs to provide appropriate safeguards.