

# Into the Future: Towards a New London Plan Consultation



James Wickham

Partner  
t +44 794 948 4580  
[James.Wickham@nmrk.com](mailto:James.Wickham@nmrk.com)



Jeremy Randall

Partner  
t +44 776 861 7235  
[Jeremy.Randall@nmrk.com](mailto:Jeremy.Randall@nmrk.com)



Alex Brown

Partner  
t +44 798 333 3510  
[Alex.Brown@nmrk.com](mailto:Alex.Brown@nmrk.com)



Suzanne Thurtle

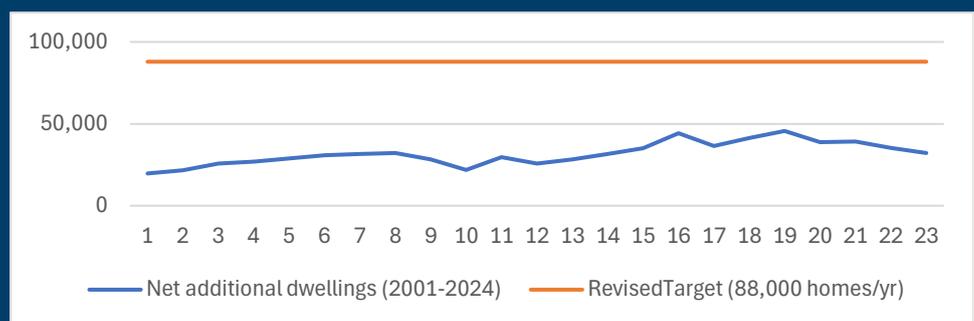
Associate – Knowledge and Policy Lead  
t +44 778 834 5907  
[Suzanne.Thurtle@nmrk.com](mailto:Suzanne.Thurtle@nmrk.com)

The Mayor has published his much anticipated ‘Towards a New London Plan’ document (TNLP) for consultation, ahead of an intended draft publication London Plan in 2026 with adoption anticipated for 2027. In this note we examine some of the key points raised within the TNLP.

The TNLP is a discussion document designed to invite feedback. Much of the potential policy direction is framed as suggestions, with the GLA asking for comments, views and evidence on potential approaches. The document therefore presents a substantial opportunity for London’s development industry to engage with emerging policy.

Notwithstanding the fact that many of the policy matters are open to comment, there are some matters which the Mayor is unequivocal on, including:

1. Delivering Government’s 88,000 homes/yr target (a very significant increase as shown on the graph below) including through utilising some green belt land;
2. The need to streamline the London Plan; and
3. The importance of using new transport infrastructure to unlock high density development.



The approach to the green belt is a U-turn for the Mayor, who previously strongly committed to its protection. Two factors have come into play though. Firstly, the Government’s target of 1.5 million homes over this Parliament, the associated new NPPF Standard Method target for London and the changes to national green belt policy places significant pressure from central Government for a change of direction. Secondly, housing delivery in the capital has been declining and has never met the current 52,000 homes/annum target, which itself was acknowledged at adoption did not go far enough to meet London’s housing need. This has been reflected by the recent reduction in the Mayor’s target for affordable housing starts for the Affordable Homes Programme. So the starting bar is low, and the Mayor is proposing this shift in policy to try and address some of the issues facing the sector.

We examine below some of the key points and themes raised within the TNLP.



## Housing & Delivery – Key Points



- (1) Revised target will require housing delivery to more than double above existing levels. Mayor to set housing targets for individual boroughs.
- (2) Mayor continuing to follow a brownfield first approach but the GLA will now actively explore releasing parts of the green belt. Density (with transport infrastructure) also seen as key.
- (3) Review of affordable housing threshold requirements, balancing of “ambition” vs “practical implementation” & focus on social rent.
- (4) Any green belt land to be released to deliver “significant” levels of affordable housing – 50%?
- (5) Strategic Housing Market Assessment (SHMA) and evidence on specialist, supported and student housing need in London all planned for autumn 2025 – should give greater clarity on housing need.
- (6) Plan could introduce borough targets/requirement for site allocations for PBSA or could be left to local level. Build to Rent seen as way to increase delivery.



## Housing & Delivery – Commentary



The housebuilding challenge cannot be underestimated. A more flexible/permissive approach to density/height and the green belt will assist, but there needs to be greater acknowledgement of the challenges facing the housebuilding industry. The TNLP states that the new London Plan will not “increase the overall burden of planning policy requirements” but should this not be looking to *reduce* burden? Residential approvals in London are decreasing, down from c. 103,000 units in 2014/15 to c. 36,000 units in 2024/25. Yes, the reasons for a decline are not all planning related, but perhaps the Mayor should consider incentives to encourage growth.

It is unclear if there will be significant changes to the Fast Track affordable thresholds. Based on last year’s GLA Practice Note (summary [here](#)), only limited adjustments are expected. Any reductions may be temporary, given positive market forecasts. Draft Affordable Housing and Viability LPGs have not yet been published and are at issue in ongoing appeals (both involving Newmark) amidst concerns that the Guidance might deter investment in London.



## Spatial Areas – Key Points



- (1) Reinforcement of role of CAZ as economic driver. Scope to significantly increase residential delivery above existing levels (4,000 homes/annum) “may be limited” due to affordability, capacity and agent of change.
- (2) Potential amendments to CAZ boundary (to remove mainly residential areas) and identification of key areas with high demand and concentrations of economic activity – Oxford St, Euston?
- (3) Brownfield first approach but acknowledgment that green belt will have a role to play. London-wide green belt review has been commissioned which will include identifying grey belt sites. Any release should make best use of land and meet “strict requirements”. Protection for MOL (with some limited potential release).
- (4) Potential streamlining and updating status of Opportunity Areas, including de-designating mature areas. Housing potential in OAs based on the delivery of key transport infrastructure including DLR extension and Bakerloo line extension.



## Spatial Areas – Commentary



The focus of the CAZ on delivering economic growth is welcome, as is the recognition that in the CAZ housing capacity may be limited. We hope that within the new ‘key areas’ (and across the CAZ more generally), the London Plan will take a pro-growth, pragmatic stance which looks to place significant weight on contributing to economic growth.

Given the Government’s approach to green belt, it is no surprise that the Mayor has followed suit with commissioning a green belt review. It will be interesting to see how this dovetails with any green belt review/release being carried out by the boroughs in the context of emerging Local Plans being brought forward with ‘current’ London Plan housing requirements – Enfield is an example of this.

Opportunity Areas certainly will have a role to play in delivering the growth which the Mayor wishes to see. As referred to throughout the TNLP, this is in large part predicated by the delivery of transport infrastructure, which will require funding and support outside of planning channels to come to fruition.



## Economy – Key Points



- (1) CAZ is uniquely important to London; economy should be supported by growth across Opportunity Areas, town centres and industrial locations.
- (2) Link between planning supporting development of growth sectors identified in London Growth Plan.
- (3) Potential strategic industrial land policy with borough designated protections and targets. Potential to change industrial land designations.
- (4) Support for night-time economy, culture & creative & visitor accommodation.
- (5) Diversified role of town centres including “very flexible” approach to range of businesses – explicitly allowing any commercial or other appropriate development in strategic town centres.
- (6) Affordable workspace to potentially expand to other uses including wider Class E uses and cultural/community; potential removal of requirement for general industrial/warehousing. Potential for more consistent approach across boroughs.



## Economy – Commentary



There is reference to ensuring that there is “enough floorspace” in the CAZ to meet demand, including for commercial floorspace. The employment projections and evidence on the CAZ’s capacity and functions are due this year so we will need to review these documents closely to ensure that the next London Plan adequately supports growth in the context of the push for housing.

Industrial land in the capital is in decline but there is a strong need. A strategic approach to designating industrial land is in theory sensible, but this will need to be thought out carefully and consider a range of industrial uses, from the more “traditional” uses like warehousing in designated industrial areas or on grey belt sites, to new emerging uses like intensified last-mile logistics in well-connected inner areas. It is also recognised that co-location of industrial and housing can be challenging, so perhaps a policy change will follow.

The potential changes to town centre policy would be helpful however the suggestions around expanding affordable workspace to other uses could affect viability. The suggestion of more flexibility in consolidated delivery is welcome.



## Design & Sustainability – Key Points



- (1) Potential principle building heights as well as minimum height benchmark and a small site design code.
- (2) LVMF currently under review.
- (3) Potential identification of strategic tall building clusters, amendment to tall building definition (?) and clearer direction on assessment for applications outside of tall building clusters.
- (4) Potential whole-life carbon and circular economy benchmarks, framework for assessing retention and review of carbon offsets to ensure they drive carbon reductions and are consistent.
- (5) TfL developing a new connectivity metric to complement PTAL and provide enhanced understanding of site connectivity.
- (6) Review of cycle parking requirements.
- (7) Removing overlap between policy and building regs on fire safety (subject to national policy).



## Design & Sustainability – Commentary



The TNLP identifies that London generally is quite low-rise and that there are opportunities for more height/density. The idea of setting height requirements/benchmarks and identifying tall building clusters is interesting, but given sensitive local characteristics we do wonder how these would be established and implemented.

The suggestions around creating a uniform approach to energy policy, and a framework for retention will be welcome news. However, any policy needs to strike a careful balance between net zero goals and delivering other aspects of sustainable development, including economic growth.

The suggestion of a review of cycle parking requirements is also positive as we have seen unintended negative consequences of over-provision in some boroughs. This is surely an area where only strategic direction is needed, with the granular detail left to local level.

The potential amendments surrounding fire safety will in part rely on national amendments.

## Streamlining

The ambition to streamline the next London Plan is welcome. National Government is progressing with plans for universal coverage of Spatial Development Strategies and the vision for those is that they primarily deal with matters of strategic importance. The current London Plan of course does consider a range of matters on a strategic level well (such as the role of the CAZ). But some matters, like Urban Greening Factor targets and detailed cycle parking standards, arguably are more detailed and perhaps should be delegated to local authority level. Providing strategic direction on key overarching issues in concise, clear policies would help to provide clarity and remove unnecessary complexity and delay.

## The In-Between

It will be interesting to see what happens between now and the anticipated adoption of the new London Plan (2027). The current London Plan (Mach 2021) is supposed to be reviewed every five years i.e. by March 2026, so the next London Plan will surpass this date.

Despite the introduction of the new Standard Method by national Government, it is the Mayor who sets housing targets for the London boroughs. With an existing London Plan fast approaching its expiry date, a significant increase in housing targets against a backdrop of under-delivery and an unknown in terms of housing allocations for the boroughs, there will be a strange vacuum of uncertainty for boroughs in terms of how they proceed with their plan-making activities and for short-term/speculative green belt applications where there is no five-year housing land supply. This is coupled with the political challenges of green belt release for the outer London boroughs, alongside a national urgency to address the housing crisis.

The increase in housing targets for London are so significant that how this is planned for and managed will affect all land uses and priorities, as well as obviously the release of any green belt land, where relevant.

## What's Next?

In the short term, the consultation on the TNLP document closes on 22 June, after which the GLA will consider responses and prepare a full draft Plan for formal consultation, which we expect in 2026. Prior to that, there will be a range of additional evidence base material prepared, including the SHMA, employment projections, the revised LVMF and cycle parking review as referred to above, as well as a document on the 'net zero policy approach' (autumn) and a document assessing the implementation of the Urban Greening Factor and target review (autumn).

We encourage clients to respond to the London Plan making process. National changes to the legislative planning framework and national planning reform is going to place even more emphasis on the development plan in decision-making. It is therefore key to seek to influence policies so that they are pragmatic, flexible and able to deliver the housing and economic growth to which the Mayor aspires.

If you would like to discuss making representations further, please do reach out to Suzanne Thurtle (Associate – Knowledge and Policy Lead) or any member of Newmark's Planning & Development team who would be happy to assist.

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