

**Local London**

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Tuesday, 27 October 2026

Sadiq Khan

Mayor of London
Draft London Plan
London Plan Team
Planning & Regeneration
City Hall
London
E16 1ZE

Dear Mayor,

Re: Local London response to the draft London Plan

Local London welcomes the opportunity to respond to the London Plan Draft. As the subregional partnership spanning nine London boroughs, northeast and southeast of the river, we share the ambition of delivering sustainable growth, increasing economic opportunity and supporting thriving communities. Rewiring the State and real devolution mean trusting boroughs to lead delivery, combining strategic London-wide ambition with local knowledge, democratic accountability and the flexibility needed to meet the needs of their communities.

The London Plan has a critical role in establishing the long-term strategic framework for London's future development. Local London supports this ambition. We are a nationally significant, fast-growing and opportunity-rich sub-region of the capital. We boast more than 40% of London's total land area and around 55% of its developable land, including brownfield capacity equivalent to the City of London. To ensure we can fulfil Local London's growth potential, we believe that the London Plan should place greater emphasis on borough autonomy, local evidence, deliverability and the distinct needs of Outer London. The London Plan must focus on matters of strategic significance across London and be grounded in realistic assumptions about delivery, infrastructure capacity and local circumstances, setting direction while allowing boroughs greater flexibility to determine how growth is delivered through Local Plans.

Local London has concerns about the risks of the London Plan becoming an overly prescriptive planning framework, moving beyond its strategic role and limiting the ability of boroughs to respond to local circumstances and priorities and shape development through locally led planning. We have questions about whether the proposed growth ambitions are fully aligned with infrastructure capacity and delivery constraints, including the deliverability of housing targets in the context of viability pressures, the growing competition for industrial land, the need for rapid digital growth, and ensuring town centres remain resilient and adaptable as retail and employment patterns evolve.

The London Plan should also give greater recognition to the differing characteristics of Outer London, particularly in relation to housing markets, transport accessibility, town centres and economic geography.

Local evidence, local knowledge and democratic accountability are not given sufficient weight within the draft Plan, creating a risk that growth targets and policy expectations may not be realistic, deliverable or responsive to the differing circumstances of London's boroughs.

Our response is structured around eight key themes.

1. The London Plan Must Remain Strategic and Respect Borough-Led Planning – The London Plan should focus on setting London's strategic direction for growth rather than prescribe local development outcomes. Boroughs must retain the sovereignty to determine how growth is accommodated through evidence-led Local Plans, reflecting local housing needs, infrastructure capacity, environmental constraints and community priorities. Strategic direction should be accompanied by genuine local flexibility and respect for local democratic decision-making.

2. Growth Ambitions Must Be Matched by a Credible Delivery Strategy – The Plan's growth ambitions should be underpinned by a more credible delivery strategy, with greater consideration of infrastructure investment, viability constraints and delivery capacity to ensure housing and economic growth targets are realistic, achievable and supported by the necessary enabling infrastructure.

3. Strategic Infrastructure Must Be Strengthened – The Growth ambitions set in the Plan should be explicitly aligned with long-term investment in transport, utilities, social and environmental infrastructure, supported by stronger cross-boundary planning and delivery mechanisms, to ensure development across Outer London is sustainable, connected and achievable.

4. Green Belt Policy Requires a More Evidence-Led and Locally Determined Approach – Green Belt and growth location decisions should remain evidence-led and locally determined through the Local Plan process, ensuring that housing and economic growth is balanced with infrastructure capacity, environmental sustainability, climate resilience and wider place-making objectives.

5. Industrial Land Must Be Recognised as a Driver of Inclusive Growth – Industrial land policies should protect and optimise employment capacity, support local jobs and inclusive growth, ensuring that decisions on industrial land provision, redistribution and land-intensive uses are evidence-led, locally informed and balanced against housing, environmental and infrastructure priorities. The Plan should place stronger emphasis on advanced manufacturing, clean technology and engineering skills, and support SME growth infrastructure that helps new and expanding businesses develop, collaborate and scale within Outer London. The Plan should also avoid creating circumstances where Outer London boroughs become the default location for displaced industrial capacity, logistics, data centres or other land-intensive uses generated elsewhere in the capital.

6. Digital Infrastructure Should Be Treated as Essential Infrastructure – Digital infrastructure should be recognised as critical infrastructure, with the London Plan supporting universal high-quality connectivity, removing barriers to investment, and ensuring that digital infrastructure growth is planned strategically and balanced alongside housing, industrial land, infrastructure capacity and environmental objectives.

7. Town Centres and High Streets Need Greater Strategic Support – The London Plan should provide boroughs with greater flexibility to support the diversification, renewal and long-term resilience of town centres and high streets, recognising their vital role in delivering local employment, services, cultural activity, inclusive growth and sustainable communities across Outer London.

8. Outer London Requires a Distinct Policy Approach – The Plan does not always sufficiently reflect the realities of Outer London. Outer London planning policies should better reflect the distinct housing, transport and economic characteristics of Outer London by giving greater weight to local evidence and enabling boroughs to determine appropriate housing mix, tenure, density and development approaches that meet local needs and support sustainable, inclusive communities.

The appended response sets out Local London's position in greater detail. We strongly recommend the London Plan to focus on creating a more strategic, flexible and deliverable planning framework that better aligns London-wide ambitions with local realities. Central to this is strengthening borough autonomy and reaffirming the role of Local Plans as the primary mechanism for shaping growth at the local level. Growth should be infrastructure-led, with housing and employment aspirations supported by credible investment in transport, utilities, health, education and digital infrastructure. We also recommend an evidence-based approach to Green Belt decisions, greater flexibility to respond to local housing needs, protection and optimisation of industrial land, stronger support for town centre renewal, and recognition of the distinct characteristics of Outer London.

Local London is committed to working collaboratively with the Mayor, the Greater London Authority and partners across the capital to deliver sustainable growth. To succeed, the final London Plan must respect borough-led planning, strengthen local decision-making and reflect the distinct needs, opportunities and challenges of Outer London. By combining strategic ambition with local expertise and accountability, London can deliver growth that is sustainable, deliverable and beneficial to communities and businesses across the capital.

Yours sincerely,

Cllr Kam Rai

Leader of the London Borough of Redbridge and Chair of Local London

Cllr David Leaf

Leader of the London Borough of Bexley and Deputy Chair of Local London

Cllr Yvonne Bear

Portfolio Holder for Renewal, Recreation and Housing – London Borough of Bromley and Vice Chair of Local London Growth Board

Local London Response to the London Plan Draft

1. The London Plan Must Remain Strategic and Respect Borough-Led Planning

Local London supports a strategic London Plan that provides a clear framework for sustainable growth across the capital while recognising the essential role boroughs play in delivering that growth. We are concerned that elements of the draft Plan move beyond the proper strategic role of the London Plan and into matters that should remain the responsibility of borough Local Plans.

Boroughs possess a detailed understanding of local housing needs, economic opportunities, infrastructure capacity and environmental constraints, and are therefore best placed to translate strategic objectives into locally deliverable outcomes. Decisions relating to growth locations, Green Belt release, housing mix, density, parking standards and the detailed application of planning policies should continue to be informed by borough-level evidence and determined through Local Plans. The London Plan should establish a coherent strategic direction while enabling local authorities to determine how growth is accommodated based on local evidence, community priorities and capacity for delivery.

The London Plan should identify strategic needs and priorities for the capital, but it should not pre-determine outcomes that are more appropriately considered through locally led plan-making processes. Strategic ambitions are most effective when supported by locally informed planning, enabling boroughs to respond to opportunities and challenges in ways that support sustainable growth, investment and place-making.

Local London strongly supports a plan-led approach that enables boroughs to respond to local housing markets, economic conditions, infrastructure capacity, environmental constraints and community priorities within an agreed strategic framework. Strategic policy should set direction, but boroughs must retain the flexibility to determine how growth is distributed, how competing land-use priorities are balanced and how local evidence informs delivery.

2. Growth Ambitions Must Be Matched by a Credible Delivery Strategy

Local London supports the ambition to increase housing and economic growth across the capital. However, there is a significant risk that the scale of growth proposed is not matched by a sufficiently credible strategy for delivery.

Supporting housing delivery will require a continued focus on viability, infrastructure and delivery capacity, ensuring that policy expectations remain aligned with the practical realities of development and investment. The Plan places considerable emphasis on growth targets but provides insufficient clarity on how the transport, utilities, social infrastructure and digital infrastructure required to support that growth will be funded and delivered. The plan also fails to address the complexity and length of the proposed affordable housing policy, which requires more concise requirements that are easier to interpret and apply consistently by boroughs and applicants.

There is a danger that the Plan prioritises the maximisation of growth without sufficient regard to deliverability. Without a clear infrastructure investment strategy, boroughs will face increasing challenges in translating growth ambitions into successful places and thriving communities.

The Plan should place greater emphasis on viability and delivery considerations. Local London is concerned that some of the growth assumptions within the draft Plan do not sufficiently reflect the cumulative impact of viability pressures, infrastructure constraints and environmental requirements on delivery. Across many Outer London locations, infrastructure costs, affordable housing requirements, environmental mitigation, utilities provision, planning obligations and wider development costs present significant challenges to delivering planned growth. Growth ambitions should therefore be accompanied by greater flexibility and regular review mechanisms to ensure that delivery remains achievable in changing economic conditions. Assessed need is also sensitive to changes in the underlying data, including affordability, and ensuring that any comparison uses the latest evidence and clearly distinguishes assessed need from deliverable capacity is essential.

The Plan should also provide greater clarity on the delivery of Gypsy and Traveller accommodation requirements. Local London recognises the importance of ensuring the accommodation needs of Gypsy and Traveller communities are appropriately met. However, the draft Plan would benefit from a clearer explanation of how proposed pitch requirements can be delivered in practice, taking account of land availability, site suitability, environmental constraints, viability considerations and competing land use pressures. Boroughs will require robust evidence, practical delivery mechanisms and appropriate support if these requirements are to be achieved in a realistic and sustainable way.

Local London plans to undertake its own infrastructure assessment to inform future housing and growth requirements, with publication planned for summer 2027.

3. Strategic Infrastructure Must Be Strengthened

Investment on transport infrastructure, schools, health facilities, community infrastructure, utilities and energy networks will be essential to ensuring places remain resilient and capable of supporting future growth. However, the draft Plan does not place sufficient emphasis on the strategic transport investment and other infrastructure required to unlock growth opportunities across northeast and southeast London.

Greater recognition should be given to the role of rail capacity improvements, orbital transport connections, strategic bus enhancements, river crossings and wider connectivity improvements between growth areas and employment centres. Growth ambitions should be explicitly linked to the infrastructure interventions required to make them achievable.

Local London boroughs continue to identify significant opportunities for growth across the Local London sub-region, many of which are dependent upon improvements to strategic connectivity. However, a recurring concern across Local London boroughs is that growth is being planned ahead of infrastructure rather than alongside it. The London Plan should provide a stronger framework for securing the long-term investment necessary to support sustainable growth across Outer London.

The Plan should also provide clearer strategic guidance on cross-boundary infrastructure planning and delivery. Many infrastructure challenges, including transport, utilities, flood resilience, waste management,

environmental mitigation and strategic environmental protection, operate beyond borough boundaries and require stronger mechanisms for sub-regional collaboration and investment planning.

Key infrastructure projects for Local London include:

- Stratford Station upgrade and capacity enhancements
- Introduction of international high-speed rail services to Stratford International.
- Elizabeth line extension beyond Abbey Wood.
- DLR extension beyond Thamesmead to Belvedere.
- Central Line upgrade.
- River crossings and orbital transport improvements.
- Strategic interventions around the M25, A12, A13, A2 and Dartford Corridor.
- Improved connectivity across north-east London growth corridors.
- Capacity and access improvements at Walthamstow Station.
- Enhanced east-west public transport connectivity linking major growth and employment locations.
- Strategic investment and expansion of facilities at Temple Mills International rail depot
- Bromley South station access, including a second entrance and removing buildings from the platforms to improve capacity and safety.

A more integrated approach to infrastructure planning and funding will provide greater confidence in deliverability and help ensure growth is realised in a way that benefits both existing and future communities.

4. Green Belt Policy Requires a More Evidence-Led and Locally Determined Approach

Local London recognises the importance of meeting London's housing and economic needs, while maintaining a strong commitment to sustainable development. However, considerations of Green Belt release require a robust local evidence base that fully assesses infrastructure requirements, biodiversity and environmental impacts, accessibility, viability, alternative development opportunities and wider place-making objectives. The Plan should recognise that circumstances vary considerably across boroughs, acknowledging the need to retain and enhance playing pitches and outdoor green spaces in some areas. Decisions relating to Green Belt, green spaces, industrial land and growth locations require a locally led approach supported by robust evidence.

The draft Plan risks moving beyond a strategic assessment of need and into decisions that should properly be made through local plan-making processes. The role of the London Plan should be to identify strategic challenges and opportunities, not to pre-empt site-specific decisions or local evidence-based assessments.

Local London is particularly concerned by approaches that prescribe housing numbers or growth outcomes for specific broad locations before boroughs have undertaken detailed local evidence gathering and testing through the Local Plan process. Boroughs must retain the flexibility to balance housing delivery alongside other strategic priorities including employment land, open space, recreation and environmental resilience.

Boroughs support a plan-led approach that allows local authorities to assess options through the Local Plan process, ensuring decisions are informed by local circumstances, existing land availability and the infrastructure required to support sustainable growth. This approach enables boroughs to identify

opportunities that are genuinely sustainable and deliverable, ensuring that any future development is supported by the necessary transport, utilities, community infrastructure and environmental mitigation required to create successful places.

The Plan should also give greater consideration to the relationship between growth, environmental assets, flood resilience, recreational pressures on protected habitats, climate adaptation, open space functions and long-term environmental sustainability.

5. Industrial Land Must Be Recognised as a Driver of Inclusive Growth

Outer London continues to play a critical role in supporting industrial activity, logistics and employment growth. The draft Plan should place greater emphasis on the contribution industrial land makes to jobs, productivity, logistics, resilience and inclusive economic growth. Future policy should recognise the importance of protecting and optimising existing industrial capacity while ensuring decisions on additional industrial land are supported by clear evidence of need.

Industrial areas play a critical role in supporting local economies across Outer London and provide employment opportunities accessible to a diverse workforce. Policies affecting industrial land should be informed by local evidence and recognise the differing functions of industrial areas across boroughs.

The Plan should strengthen the relationship between industrial policy, employment growth and skills development to ensure economic growth translates into opportunities for local residents. Major developments should be expected to contribute to employment, apprenticeships and workforce development, with flexibility to support delivery through established sub-regional partnerships where appropriate.

The Plan should place greater emphasis on supporting the growth of advanced manufacturing, clean technology and engineering sectors, recognising their increasing importance to London's economic resilience, productivity and transition to a low-carbon economy. This should be complemented by a stronger focus on developing the technical, digital and engineering skills needed to meet future workforce demands and enable residents to access emerging employment opportunities. The Plan should also support the provision of managed workspace, innovation hubs, incubator and accelerator space, and other SME growth infrastructure that helps new and expanding businesses develop, collaborate and scale within Outer London.

The Plan should also avoid creating circumstances where Outer London boroughs become the default location for displaced industrial capacity, logistics activity, data centres or other land-intensive uses generated elsewhere in the capital. Any redistribution of industrial activity, logistics uses or strategic infrastructure should be based on jointly agreed evidence and balanced against local housing, environmental and infrastructure considerations.

6. Digital Infrastructure Should Be Treated as Essential Infrastructure

Digital connectivity is now fundamental to economic growth, business competitiveness, innovation and access to public services. The London Plan should recognise digital infrastructure as critical infrastructure alongside transport, utilities and social infrastructure. London's growth depends on addressing gaps in

digital infrastructure provision. At a minimum, this is ubiquitous gigabit broadband connectivity to residents and businesses, fibre routes into growth zones and an improvement in mobile capacity and reliability.

Greater emphasis should be placed on future-proofing digital connectivity within growth areas, town centres and strategic employment locations to support both economic growth and service transformation. The plan should call for a review of planning policy relating to digital infrastructure to remove investment barriers. In addition, there is a need for early and full consideration of digital infrastructure in the planning of new developments.

The Plan should also provide a clearer framework for accommodating digital infrastructure uses, including data centres and emerging technologies, ensuring that digital growth is balanced alongside housing delivery, industrial land requirements, infrastructure capacity and environmental objectives. The location and distribution of such uses should be evidence-led and should not place disproportionate pressure on Outer London boroughs.

7. Town Centres and High Streets Need Greater Strategic Support

Local London supports the role of town centres and high streets as drivers of economic activity, employment, service provision and community life. The London Plan should provide greater flexibility for boroughs to manage the changing role of town centres while safeguarding their long-term vitality and function. Policies should enable councils to balance commercial, residential, cultural and community uses in ways that respond to local conditions and market demand.

The Plan should recognise the varied role that town centres play across Outer London, including as locations for local employment, public services, community facilities, leisure, culture and everyday retail activity. Greater flexibility is needed to support the adaptation of centres to changing consumer behaviour, evolving business models and new forms of economic activity, while maintaining their role as the focal point of local communities.

The Plan should also support improvements to accessibility, public realm and the quality of town centre environments, recognising that successful centres will play an increasingly important role in delivering growth, local employment and sustainable communities across Outer London.

Greater flexibility should be provided for boroughs to respond to changing retail patterns and commercial uses while ensuring that town centres remain attractive, accessible and resilient. This should include support for a broader mix of employment, cultural, community and service uses, enabling centres to diversify their economic base, encourage footfall throughout the day and evening, and contribute to inclusive growth. The Plan should recognise the unintended consequences of the broadening and consolidation of planning use classes, which has reduced local authorities' ability to manage the composition of high street frontages, prevent the homogenisation of town centres, and resist uses that may undermine the vitality, character and long-term function of high streets. It should also recognise the important relationship between town centres and surrounding residential communities, particularly in Outer London where centres often serve a wider catchment and play a key role in supporting family-friendly neighbourhoods and reducing the need to travel longer distances for services and employment opportunities.

8. Outer London Requires a Distinct Policy Approach

The Plan does not always sufficiently reflect the realities of Outer London. Development patterns, levels of transport accessibility, housing demand and town centre functions often differ significantly from those found in central and inner London and require more nuanced policy responses. Policies relating to housing mix, density and parking standards should better reflect local evidence and the continued demand for family housing in many Outer London communities. A one-size-fits-all approach risks undermining housing delivery and fails to recognise the diversity of London's places.

Delivering London's housing ambitions requires policies that reflect the diversity of housing needs across the capital. Many Local London boroughs continue to experience high demand for family housing, and local planning authorities should retain flexibility to determine appropriate housing mix requirements that reflect their communities and support mixed, inclusive neighbourhoods.

The draft Plan should also better recognise the importance of larger family homes in boroughs with larger average household sizes and higher levels of overcrowding, placing greater weight on borough-level evidence regarding household size, overcrowding, demographic trends and local housing needs. It also should ensure specialist housing products such as co-living complement rather than replace conventional housing delivery. The contribution of Build to Rent and other innovative delivery models is recognised as an important component of London's housing supply. These approaches can diversify delivery, increase housing choice and accelerate development, provided they operate alongside wider affordable housing objectives and contribute positively to local communities.

Boroughs have worked closely and collaboratively with the GLA to identify land and assess capacity. However, boroughs are best placed to determine the tenure mix required within their areas, ensuring housing delivery responds to local evidence and supports the creation of balanced and inclusive communities. Greater flexibility to determine housing mix and tenure through local evidence would support the delivery of balanced communities and ensure new development responds effectively to local need. The continued success of Outer London depends upon a planning framework that recognises its unique contribution to London's housing supply, economic growth, logistics capacity and environmental assets. Local planning authorities should retain the flexibility to respond to local demographic circumstances and housing market conditions rather than relying solely on London-wide assumptions.

Local London stands ready to work in partnership with the Mayor, the Greater London Authority and other stakeholders to deliver sustainable growth. This can only be achieved through a genuine partnership between London-wide ambition and borough-led delivery, where local authorities are empowered to determine how strategic objectives are translated into successful, sustainable and locally supported outcomes.