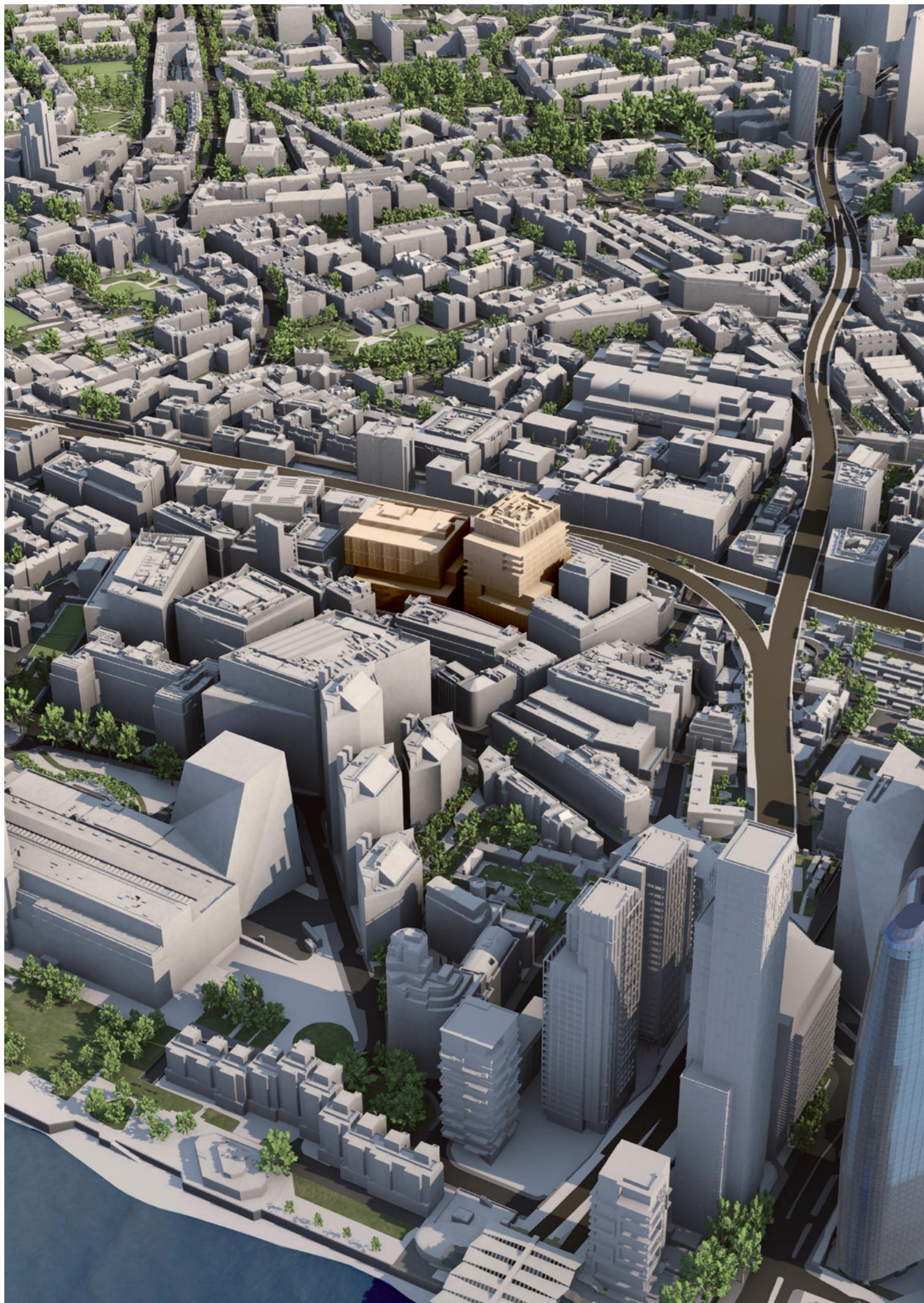


# Towards a New London Plan. Consultation summary.

DECEMBER 2025





## GLA New London Plan. Consultation Summary.

**The current London Plan (adopted in March 2021) set out a framework for how London would develop sustainably during the subsequent 20-25 years.**

The London Plan must be reviewed every five years, and a draft new plan will be published for consultation in 2026. The whole document will be re-written – this is a new plan, not an amendment.

In preparation for this, the Mayor set out a path towards the next London Plan through a consultation process that ran from 9 May to 22 June 2025.

GLA and wider London community including Business London.

# Executive summary.

## Purpose.

The recent engagement is the first consultation about a new London Plan. It proposes a range of options; not all are supported by the Mayor. It is a call for evidence from industry about their experience in applying the current London Plan which can then be used to feed into policy proposals for the draft plan next year.

We anticipate that future rounds of consultation will provide further opportunity for industry to guide development of the new plan.

## Ambition beyond regulation?

The New London Plan is intended to be more streamlined so as not to increase the burden on development.

As such, the consultation requests feedback from industry about whether the New London Plan should continue to sit above Building Regulations and be “an agent of change”, driving policies on the environment, resilience, heat networks, carbon and water or if this should be left to national policy and regulations. A hybrid option under consideration would be to adopt industry guidance such as the UK Net Zero Carbon Building Standard, or advocate for Part Z of the Building Regulations.

It is suggested that London is already at the forefront of national ambition raising questions about whether individual London Boroughs should have power to further raise standards. The current requirement for 35% reduction in CO<sub>2</sub> emissions over Part L is recognised as a successful lever to drive improvements although there is debate about where the target should sit and whether it should flex to suit different sectors.

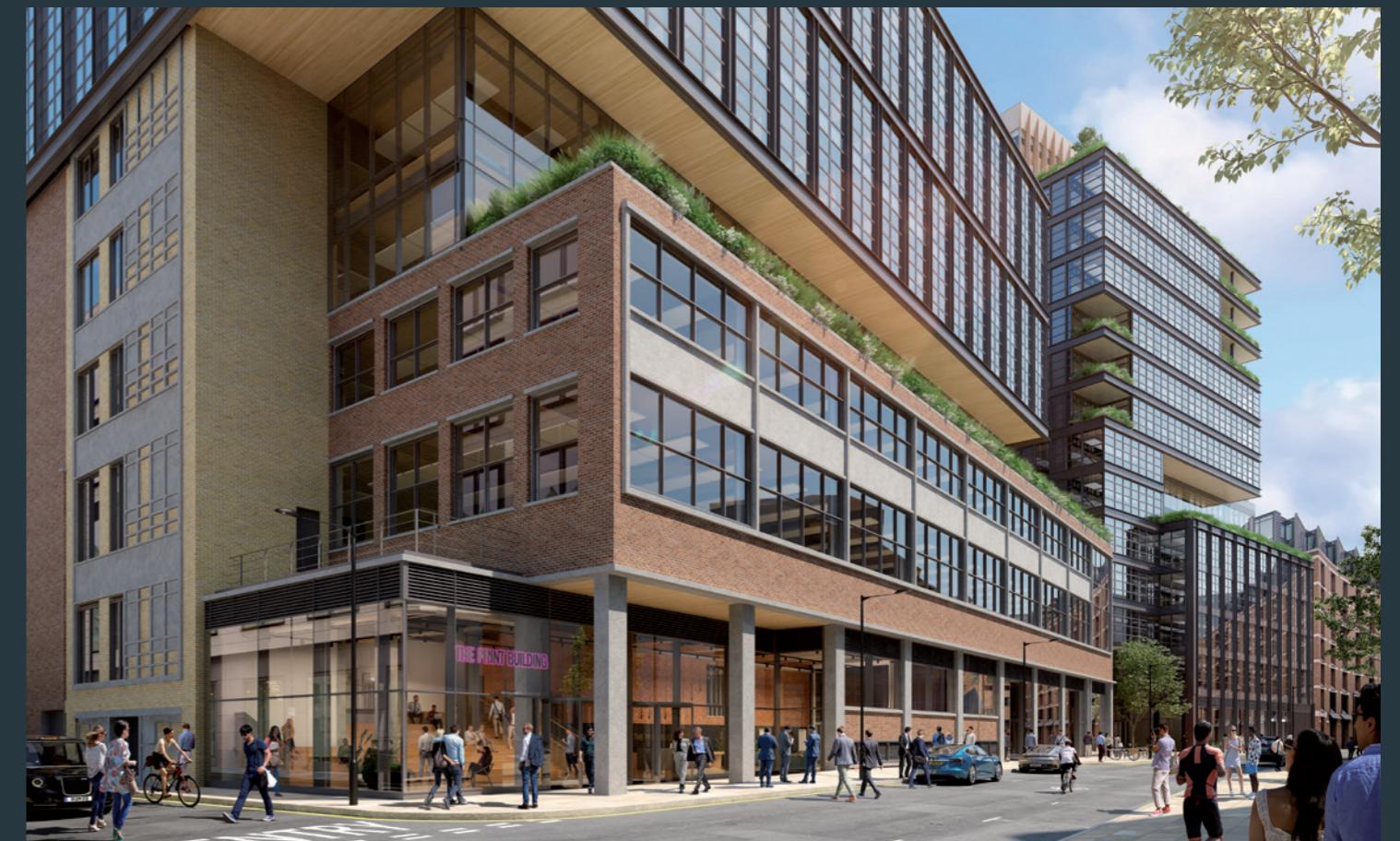
In time, the % improvement may become less relevant as we move towards measuring Energy Use Intensity, in which case industry will need a standard methodology to follow, potentially through the wider adoption of CIBSE TM54 approaches such as the Passivhaus Planning Package (PHPP) for residential schemes and NABERS for commercial offices.

Since the last London Plan was published, the subject of whole life carbon (WLC) has advanced and there are concerns within the industry about how consistently the analysis is being conducted and the impact this has on comparing results with the benchmarks. The new plan would provide an opportunity to improve the accuracy of WLC assessments through a more detailed, standardised methodology alongside clear checking and verification procedures.

Further industry feedback is requested to agree where the targets should be set. There is the potential for more demanding targets in energy and WLC and a question about whether targets should be set, or limits imposed.

## Delivering on policy intent.

Whether the approach goes beyond regulation or not, industry appears to be calling for more consistency about how local boroughs implement the GLA policies.



**Timber Square**  
Image: Landsec

Comments align around understanding the scale of the project, the level of information available at the planning submission stage and how operational data is collected and evaluated.

Calling for more detail and checks potentially places additional burden on project teams and Boroughs who are governing the requirements of the plan. In many cases, this has led to outsourcing which, over time, leads to a skills gap in the Borough.

## What happens next?

A Draft London Plan is due to be released for consultation in 2026 followed by an examination process (2026-2027) prior to adoption in 2027. We intend to provide further commentary and insights on that draft soon after it is made available.

Until then, we'd love to hear your thoughts on any key changes or core topics that you'd like to see be given greater focus in the New London Plan.

## Overheating risk.

Analysis as part of the UKGBC's Climate Resilience Roadmap indicates that London is at particular risk due to the urban heat island impact. This manifests in higher temperatures, which when projected into future scenarios deliver extreme levels of internal temperature at high frequency in many different building types.

Through work undertaken as part of the UK Green Building Council (UKGBC) Resilience Roadmap, our analysis of weather profiles required by regulations suggests that they do not adequately reflect climate change and therefore they are unlikely to effectively facilitate design for thermal comfort. As suggested in the consultation, it would be recommended that future climate scenarios are required to be included in assessment of thermal comfort.

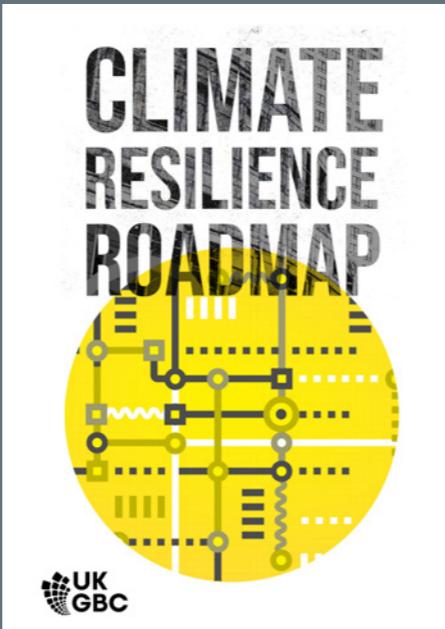
The application of the cooling hierarchy through the current London Plan has encouraged greater consideration of façade design to reduce overheating risk.

**Resilience roadmap.**

Historically, overheating has not been a major concern in the UK. In our temperate maritime climate, with its cold winters and mild summers, heating has always been a far higher priority than staying cool.

That is now changing, as summers become hotter and heatwaves more frequent. Overheating is dangerous to human health: prolonged exposure to high temperatures puts the human body under cumulative stress. This is particularly important to protect older people, children, and those with underlying illnesses such as heart disease, diabetes, asthma and dementia, who are most vulnerable. Passive adaptation measures should be considered first to limit the need for active cooling.

The thermal modelling completed for the technical report identified the most effective passive interventions to be reducing glazed areas, using solar control glass and external shading. Increasing ventilation rates through more openable windows is also effective but, this is often limited by environmental constraints, such as acoustics and air quality, which are especially prevalent in urban development sites in London.



Timber Square  
Image: Landsec

Homes in London are often constrained by factors such as air quality and noise pollution that limit the use of openable windows to maximise natural ventilation. This leads to a need for active cooling which could inadvertently neglect a fabric first approach.

It is important therefore to develop the cooling hierarchy through the new London Plan. By doing so, it will help support teams to embed passive design measures as a key principle to minimise overheating risk before relying on active systems to deliver thermal comfort.

In turn, this will not only reduce energy consumption and associated carbon emissions but also running costs which, if not regulated, may lead to a "comfort poverty" whereby occupants are not able to run the systems at affordable levels. In addition, this could reduce over-reliance on mechanical cooling and ventilation that contribute to heating outside air and exacerbating the urban heat island effect. It may be necessary to introduce a mechanism to more accurately assess the running costs associated with cooling, as SAP cannot currently do this.



**Earl's Court**  
Images: Earl's Court Development Company

## Energy.

While national building regulations have driven improvements in energy efficiency standards and the existing London Plan goes beyond these minimum requirements, does either approach go far enough in our journey to net zero?

The new London Plan could move to different energy standards for buildings; for example, the measures emerging from industry practice (e.g. UK Net Zero Carbon Building Standard) or being used by boroughs in their updated local plans. It could also change the thresholds at which policies apply (i.e. smaller developments).

A key action from this recent consultation is a call for evidence from industry to inform the benchmarks set within the new London Plan. For example, if a percentage betterment is to be retained, then there is opportunity now to analyse current performance and test whether proposed policy targets are achievable. This could address the critique that the current percentage betterment is not feasible for some building types and provide an opportunity to revise the targets so that they are challenging but technically achievable.

As an alternative to carbon betterment, the London Plan could move to different energy standards for different buildings. This is likely to encourage passive design principles, balancing solar gains to support thermal comfort. If this option was introduced, consideration should be given to adopting the CIBSE TM54 methodology to accurately predict performance as opposed to stipulating a set of design parameters. Whilst reviewing this approach, consideration should be given to the published EUI targets as the one for offices is currently lower than that required to achieve a 5-star NABERS rating.

Using energy instead of carbon to determine offset may be important to consider as electricity continues to rapidly decarbonise and the cost to offset the low carbon emissions via energy savings may start to be increasingly expensive. Alternatively, carbon offset costs could be built in to keep pace with decarbonisation. Understanding the use of the carbon offsets and the impact they have on carbon emissions would also be beneficial.

To support a whole life carbon approach, the calculation of offset payments could be extended to include embodied carbon alongside operational.

### Future Homes Standard.

The Future Homes Standard (FHS) and the Home Energy Model (HEM) represent significant advancements in the assessment of energy performance for new dwellings. The Home Energy Model, set to replace the Standard Assessment Procedure (SAP) in 2025, will provide a more accurate and holistic evaluation of energy efficiency, aligning with the net-zero objectives of the built environment.

Given the London Plan's commitment to sustainability, clarification is needed on how these new standards will be integrated into planning policies.



# Whole Life Carbon and Circular Economy.

## **WLC benchmarks.**

In lieu of regulation surrounding whole life carbon and circular economy, benchmarks and offset payments may offer a significant incentive to attempt to work harder to reduce performance metrics of development or to look to explore more innovative approaches in relation to refurbishment and new build. In a similar vein as the comments related to carbon offset payments, a careful approach to setting these targets would be welcome, making them challenging but not punitive.

A rigorous approach should be set out if any financial incentives/penalties are to be introduced for WLC to ensure fair, accurate and complete assessments, potentially with third-party reviews. Any proposed incentives should support reductions, particularly in Upfront Carbon as this is the module (A1-A5) where developers can have certainty.

## **CE benchmarks.**

The current requirements are subjective and open to misinterpretation, e.g. in terms of circularity, how do you demonstrate 'enough' adaptability?

The introduction of CE benchmarks would aid performance assessment, with the approach designed to drive maximum benefit whilst limiting the amount of data that needs to be gathered. Significant research has been conducted into appropriate CE metrics since the last London Plan was released. This work should be reviewed when developing metrics for the revised London Plan to ensure alignment with latest industry thinking.

## **Retention framework.**

The requirement for pre-redevelopment and pre-demolition audits is currently only included within the GLA Circular Economy Statement guidance, which has led to some legal challenges. This can result in the pre-redevelopment audit being conducted as an afterthought, when the decision to demolish the existing building has already been made. Pre-redevelopment options need to be carefully interrogated to ensure challenges are put in the right place.

## **End-of-life strategy**

To promote a truly circular economy it is important to bring the end-of-life thinking forward, to avoid repeating the same discussions about demolition years down the line.

Whilst the GLA CES guidance requires projects to submit an end-of-life strategy, it currently places more emphasis on compliance and reporting than on producing a robust and actionable end-of-life plan. Requiring detailed deconstruction plans, material passport documentation, and developing metrics to measure adaptability, flexibility or disassembly could be some of the ways this can be achieved.

## **Alignment between energy strategy, WLC and CES.**

Currently the energy strategy, WLC and CE planning documents are reviewed independently from each other, however, to fully understand the merits of each individual assessment/strategy, they need to be prepared and reviewed in tandem given the concepts are all interlinked.

Additionally, it may be beneficial to review how the energy statement and WLC requirements align.

Consideration should be given to rationalising the GLA's WLC & CE reporting templates by combining/ simplifying them to avoid duplication and improve functionality. Acknowledgement and appreciation of the stage of the design at planning stage would be beneficial as many items remain undecided.



**Earl's Court**  
Images: Earl's Court Development Company



10 King William Street  
Images: The Boundary

## Air quality.

The Mayor has committed to working towards the World Health Organisation (WHO) air quality guidelines, bringing the policy requirements in line with latest health-based evidence. This alignment is expected to provide clearer guidance on the air quality assessment levels to be applied across London, as opposed to the variations currently experienced when dealing with different Boroughs.

The introduction of "Air Quality Positive" in the 2021 London Plan was a marked step forward in trying to secure improvements in air quality through development, however our experience indicates that further guidance on Air Quality Positive requirements would help to clarify when this approach should be implemented. The suggestion of benchmarks (as used for Air Quality Neutral) would help developers to understand the level of mitigation required, but these would need to be carefully set out to avoid limiting ambition where there is opportunity to go beyond minimum requirements. We look forward to learning more about the use of interim targets and their timescales.

The consultation indicates that a wider range of pollutants might be considered under the new plan – for example from construction, encouraging connection to mains power rather than polluting generators, but there is limited detail on which these might be. We would recommend seeking guidance from the Institute of Air Quality Management to align with current and upcoming industry guidance.

## Fire.

The consultation recognises that planning officers are not qualified to assess fire safety and there is confusing overlap of planning policies and building regulations.

Subject to a proper national framework being in place by the time the next London Plan is published, the consultation proposes separating fire safety regulations from planning to simplify the approval process and provide a more consistent approach across the different London Boroughs.

If the subject of fire safety is retained in the revised London Plan, it should be expanded to include practical guidance on how fire safety policy is applied to reduce uncertainty and inconsistency across the industry. For example, under the current London Plan, complying with the latest updates to the Building Regulations and Fire Safety Guidance does not necessarily achieve compliance with Policies D5 (Inclusive Design) and D12 (Fire Safety). Therefore, if the current level of fire safety and inclusive design for buildings in London were to remain, the current fire safety guidance is not adequate and would require further amendments.

## London's housing system is standing at a crossroads.

At a recent Business London event, the GLA set out an emergency package of measures designed to shake loose a development pipeline increasingly constrained by viability pressures, rising costs, and a planning system struggling to deliver at pace.

What emerged was a picture of a city attempting to accelerate delivery while rewriting parts of its rulebook in real time. The proposals which are currently under consultation, stretch from design flexibility to financial incentives, each intended to bring stalled schemes back to life. Cycle parking and design standards are earmarked for immediate relaxation, removing long-standing requirements such as dual-aspect norms and the eight-dwellings-per-core limit. On paper, these shifts aim to create space for pragmatic design choices without sacrificing quality.

The headline intervention, however, is the time-limited planning route. By offering a reduced 20% affordable housing threshold with a strong emphasis on social rent, and waiving viability testing, the GLA hopes to draw forward schemes capable of building out swiftly. The accompanying review framework incentivises early starts, with first-floor construction by March 2030 acting as the key milestone. Meanwhile, developers meeting the criteria may retain a portion of surplus profit, signalled a more permissive stance to get London building again.

A parallel temporary borough CIL relief offer introduces financial levers to support viability, scaling from 50% to 80% depending on affordable housing levels. The £322m City Hall Developer Investment Fund adds further momentum, targeting stalled sites with early-delivery potential.

Yet the discussion also revealed a quiet friction. Attendees expressed caution around Boroughs' views of CIL losses, legal uncertainties, and the relationship between interim policy and the forthcoming London Plan. Developers questioned how existing consents, Section 73 amendments, and multi-phase schemes would be treated in practice.

What became clear is that London's ability to unlock new homes will depend not just on new levers, but on alignment. Without a shared understanding between the GLA, boroughs, RPs, and developers, even the most ambitious measures risk stalling in the very system they aim to relieve.



## Engineers of human experiences.

Hoare Lea is an award-winning engineering consultancy with a creative team of engineers, designers, and technical specialists. We provide innovative solutions to complex engineering and design challenges for buildings.

Irrespective of the scale or complexity of a project, we provide a full range of MEP, environmental, and sustainability services, bringing buildings to life and ensuring that they perform in operation as well as they look.

HOARELEA.COM

For further information, please contact your local representative or:

**Greg Jones**  
01454 806649  
gregjones@hoarelea.com

