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Draft London Plan (2026). Changes on the horizon.

NOVEMBER 2026





Capella, King's Cross
Photo: Billy Bolton for Allied & Morrison

Draft London Plan (2026). Status.

The current London Plan (2021) is the Mayor of London's spatial development strategy for Greater London.

The London Plan must be reviewed every five years and consultation on a future plan ran from July to October 2026. Following this period of consultation, it is anticipated that an amended final version of the plan will be published for examination in public during 2027 with adoption anticipated for early 2028.

Borough's Local Plans must align with the London Plan policies to provide a coherent strategy for how London can develop sustainably during the next 20-25 years.

We understand that The Draft Plan carries limited weight in the determination of current or future applications until such time as it has progressed through 'Examination in Public' and found to be sound.

Hoare Lea has contributed to the consultation response through engagement with Real Estate UK and Business London among others.

Draft London Plan (2026).
Executive summary.

Purpose.

The Draft London Plan 2026 ('The Draft Plan') looks ahead to 2050, setting out a strategic framework to deliver good growth and provide a blueprint to build a fairer, greener London for everyone. The Draft Plan aims to fix the housing crisis, deliver sustainable economic growth while continuing to meet ambitious climate commitments and improve our environment and green spaces.

It is claimed that investment in transport infrastructure such as the Bakerloo Line extension and the West London Orbital will help provide the catalyst for delivering up to 558,000 new homes over the next decade. However, this is below the MHCLG target for London of 850,000 new homes, as determined using the standard method for calculating local housing need.

The Draft Plan positions policies designed to strengthen London's economy through new data centres for AI, creating new strategic economic clusters to unlock future growth opportunities and revitalising high streets, including transforming Oxford Street.

In numbers.

All
major developments to meet new energy efficiency standards

30
brownfield first opportunity areas

20
environment opportunity areas

17
metropolitan scale tall building locations

270 ha
more land for industrial by 2036

558,000
new homes over 10 years

50%
strategic target for affordable homes

Key headlines.

Energy hierarchy replaced with baseline and aspirational Energy Use Intensity (EUI) targets set by building typology.

Cash-in-lieu carbon offset mechanism removed.

Heating hierarchy replaced with a mandatory Low Carbon Heat Appraisal that enables developers to evidence an optimum low-cost, low-carbon solution.

Fixed targets introduced for **upfront embodied carbon** to replace the previous range between baseline and aspirational.

Circular economy targets relating to re-use, recycling and recovery rates are included within policy as opposed to supplementary guidance.

Heat risk is approached more holistically, placing greater focus on passive mitigation and adaptation e.g. high albedo materials and external shading. Active measures must be demonstrated not to exacerbate the urban heat island effect and blue/green infrastructure for urban cooling is encouraged.

Biodiversity net gain is brought into The Draft Plan alongside greater ambition to increase urban greening including a new requirement for industrial development to achieve an Urban Greening Factor (UGF) of 0.2.

Whilst the **air quality neutral** requirement remains, this will be harder to achieve as baseline data is revised e.g. lower transport emissions anticipated from fewer cars alongside a greater uptake in electric vehicles.

Entirely **new policy concerning data centres** addressing grid capacity, water use and capture of waste heat. Such developments will be required to demonstrate wider benefits and environmental improvement beyond their project boundary.

Stakeholder engagement is required to address **utilities and grid capacity issues** and deliver a more coherent approach to provision of these essential services.

Executive summary.
(continued)

Ambition beyond the National Planning Policy Framework.

London has consistently sought higher standards than those set by national requirements. This ambition remains.

The draft National Planning Policy Framework (NPPF) seeks to simplify the planning system and 'avoid adding to the cumulative burdens on new development to the extent that viability is undermined'. The Draft Plan is stated to align closely with the NPPF but cites 'particular challenges in London which are distinct to other parts of the country' as justification for stand-alone policies. Mitigation is offered through a suggestion that the future London Plan will enable Boroughs to embed consistent standards across London, using industry-recognised metrics. The Mayor feels that reverting to national standards would undermine progress towards Net Zero Carbon (NZC) and the fulfilment of his legal duties. The Mayor also feels it would represent a worsening of the current position in London, which seems untenable in the context of the climate challenges facing the city.

The Draft Plan proposes baseline and aspirational targets for Energy Use Intensity (EUI) and Space Heating Demand (SHD) for major development by sector. Similarly, baseline and aspirational targets are set for upfront embodied carbon. This replaces the previous approach to reduce operational carbon emissions and make financial contributions through 'cash-in-lieu payments' or 'carbon offsetting'.

Whilst The Draft Plan may not be fully inline with the aims of the draft NPPF – to streamline planning and reduce complexities and burdens on development – it is considered an important response to the Mayor's climate change duties and a necessary quality marker that also reduces bills for Londoners.

NPPF Plan Making Policies: PM13: Setting Standards.

NPPF Policy PM13 allows Local Authorities to set energy efficiency standards that go beyond current or proposed Building Regulations, provided they have a clear and robustly costed rationale which shows that there will not be an adverse impact on viability and deliverability of development.

It will be for the planning inspectorate and the Minister for Housing and Planning to determine alignment with the NPPF and suitability of the London Plan. It is conceivable, therefore, that we may see changes to some of the draft policies where there is deemed to be misalignment, for example on EUIs. However, given the political affiliation of national and regional administrations, it might be the case that privileges are agreed for London. Perhaps the direction will depend upon the number of housing starts that are recorded in London over the next 12 months. If numbers don't improve, central government make take the view that the London Plan needs to be fully aligned with the NPPF.



Thameside West
Image: Silvertown Homes Ltd. / Arada London, image produced by Bloomimages

A vision for Good Growth.

It is stated that 'Good Growth' is the core principle upon which all policies in The Draft Plan are based, defined by the Mayor as 'growth that drives economic productivity, is socially inclusive and environmentally sustainable'.

The vision is supported by four core objectives that are summarised below.

Table 1: Good Growth objectives (non-exhaustive list)

Objective	Goals	Justification
Making the best use of land	– Optimise land use to meet development and transport needs while minimising loss of greenfield land and other valued features. – Enable places to renew and evolve addressing strategic and community needs.	– Use the planning system to deliver against the range of requirements for housing and economic activities alongside green, transport, social and utility infrastructure.
Delivering the homes and neighbourhoods Londoners need	– Address current housing shortfalls. – Improve affordability and availability of suitable homes for all. – Ensure neighbourhoods provide safe, comfortable and convenient access to facilities and services that address community needs.	– The lack of affordable and accessible housing is driving significant inequality, poor health outcomes and wider social inequality.
Growing London's economy in a way that benefits all	– Support priority growth sectors and businesses to thrive. – Support economic clusters to evolve and improve their resilience to economic and social change. – Improve access to jobs, skills and opportunities for all. – Accelerate shift to a more sustainable economy, reducing local and global environmental harm.	– Planning needs to help unlock a range of premises for offices, lab space, industrial and creative workspace, experience, leisure, retail and data centres alongside critical infrastructure for transport and energy. Such development must secure additional benefits while minimising environmental and other impacts.
Creating a greener, resilient and healthy city	– Contribute to net-zero carbon ambition. – Improve the resilience of people, buildings and places to climate change impacts. – Conserve and enhance the natural environment to achieve environmental net gains, promote biodiversity and support recovery and renewal of natural systems.	– Use planning to deliver built and natural environments that promote liveability, inclusion and equality of opportunity, resilience, net zero carbon and improved health for all. – Enhance access to green space through place-based approaches and design to create a greener, resource-efficient, resilient and healthy city.

Making the best use of land.

The Mayor's Transport Strategy aims for 80 per cent of all trips in London to be made on foot, by bike or using public transport by 2041.

Sustainable transport is seen as a mechanism to enable growth. By reducing our reliance on private cars, more space can be found for housing and green space. Car-centric uses that make poor use of land, such as drive-throughs or low-density retail parks, except for charging stations for electric vehicles, should be refused.

Boroughs should identify a set of transport interventions alongside their Local Plans that manage and reduce road traffic to facilitate growth. Developer contributions may be expected to improve active travel infrastructure, local public transport links and minimising road danger and congestion.

Measures to support the use of sustainable modes for local deliveries might include:

- Urban logistics hubs to support place-based consolidation and last-mile delivery.
- Development-based consolidation and reception facilities, such as parcel lockers, concierge and storage facilities.
- Optimising site layouts to facilitate connections to existing or planned railheads or wharves.

Delivering the homes and neighbourhoods Londoners need

It is claimed that deliverability of the 850,000 homes target is limited by insufficient transport infrastructure which will need to be addressed through the Plan period. The Draft Plan enables delivery of 558,000 homes over 10 years.

Draft Policy HN3 'Delivering Affordable Housing' retains the 50% strategic target for affordable housing, identifying that the highest need is for social rent. The threshold approach has been amended to account for variations in land values and costs. For private land, the threshold approach introduces three locational bands across the city, in place of one, with affordable housing percentages for fast-track varying from 20%, 25% and 35%.

Green Belt land around "well-connected stations" could be released to create more opportunities for housing, industrial storage and distribution. Development is only permitted where assessed needs cannot be met through other means and The Draft Plan proposes that other land use types will be reallocated to 'offset' the use of Green Belt e.g. industrial use classes might be changed to residential or commercial.

Draft Policy PV7 'Sustainable Development and Enhancement of the Green Belt' seeks to protect and enhance as much Green Belt as possible, however, strategic parcels of Green Belt land have been allocated within certain Boroughs based on their potential to improve access to green infrastructure and biodiversity.

Growing London's economy in a way that benefits all.

Specific measures in The Draft Plan intended to support priority growth sectors and businesses to thrive include:

- Brownfield-first approach, aligning increased density with transport connectivity resulting in more mid-rise development while tall buildings are focused in 17 strategic locations.
- Support for mixed-use developments, including proactively phasing out land-use classes that don't take advantage of well-connected sites, such as car parks.

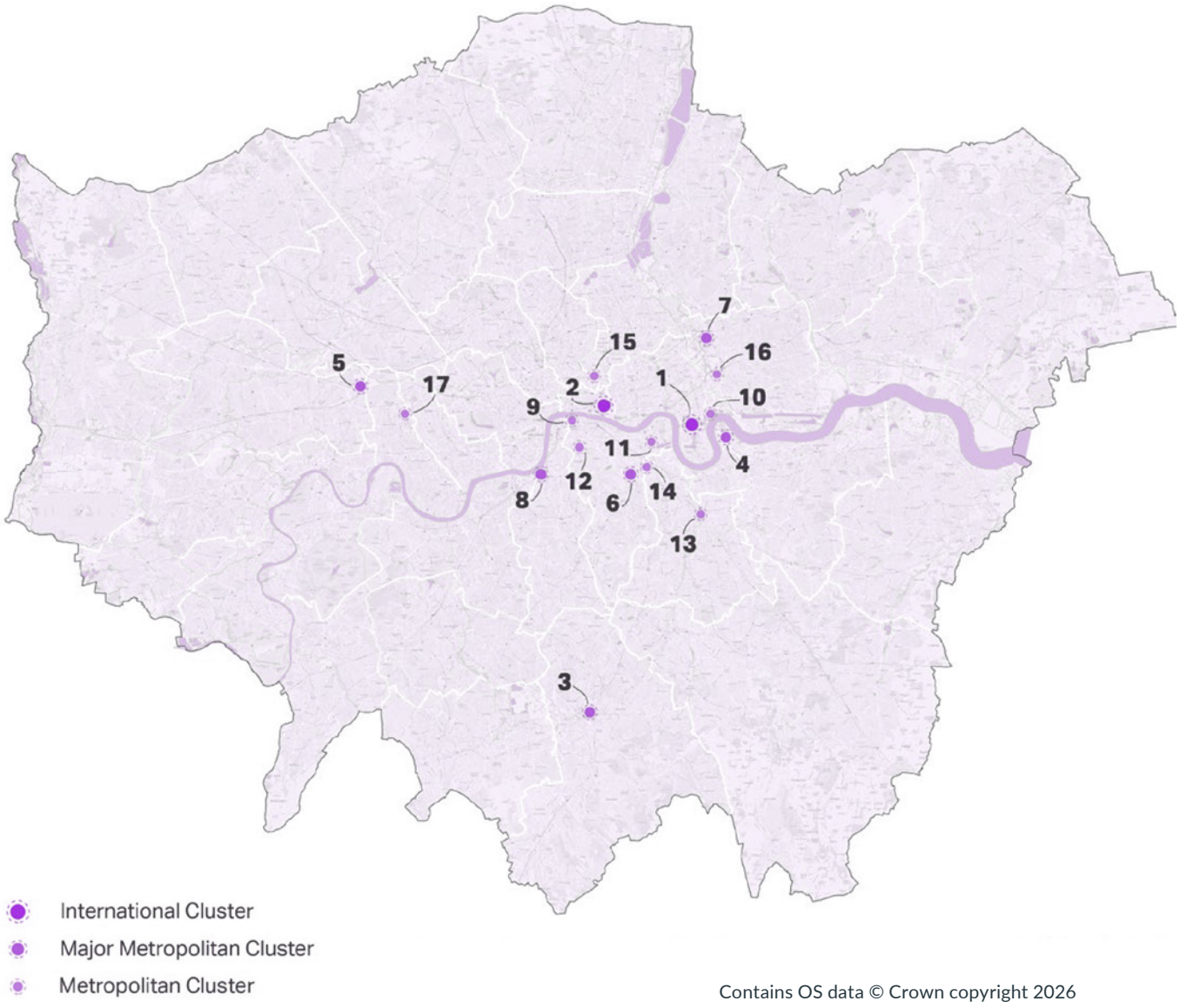


Figure 1: Locations where metropolitan tall buildings may be appropriate.
Source: Draft London Plan (gov.uk)

Draft Policy MBUL2 'Optimising Site Capacity' is a new policy approach to promote increased densities, particularly mid-rise, on sites over 0.25ha. A new optimisation framework sets minimum expectations for density ranges based on a Sustainable Access Measure (SAM) and context map.

SAM is a measure of different travel times to jobs, services and amenities by public transport and walking. It was developed by TfL to inform land use policy and ensure integration with transport planning. SAM evaluates the overall sustainability and accessibility of a location within Greater London and is calibrated to predict where households are less likely to own a car. SAM does not replace the Public Transport Accessibility Level (PTAL) which is a more granular measure of walking distance to public transport nodes and the frequency and type of services (including reliability) accessed from them.

Creating a greener, resilient and healthy city.

Draft Policy MBUL6 'High-Quality Design for a Growing, Changing City' challenges building designs to respond to the changing climate.

Development proposals should incorporate appropriate measures early in the design process to reduce negative impacts on neighbourhood amenity, including not causing adverse glare and carefully considering and addressing wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood so as to not unacceptably compromise comfort and the enjoyment of nearby open spaces and the public realm.

Development proposals should use high-quality robust materials which relate to the context and are appropriate for all weather conditions, including those anticipated by future climate modelling. High-quality external shading (such as awnings and shutters) should be incorporated to windows to prevent unnecessary solar gain and minimise overheating risk. These measures demonstrate tangible efforts to deliver climate-resilient schemes.

Draft Policy MBUL9 'Healthy Streets and Public Realm' is intended to deliver social sustainability and climate resilience, promoting a healthy streets approach in line with the ambitions of the Mayor's ending Violence Against Women and Girls (VAWG) Strategy. Supporting measures include:

- Prioritising active and sustainable travel through high-quality walking and cycling connections to public transport infrastructure.
- Seating, trees and other forms of shade and shelter.
- Minimising impermeable surfaces and improving sustainable drainage and biodiverse planting.
- Encouraging the use of streets as social spaces for play.

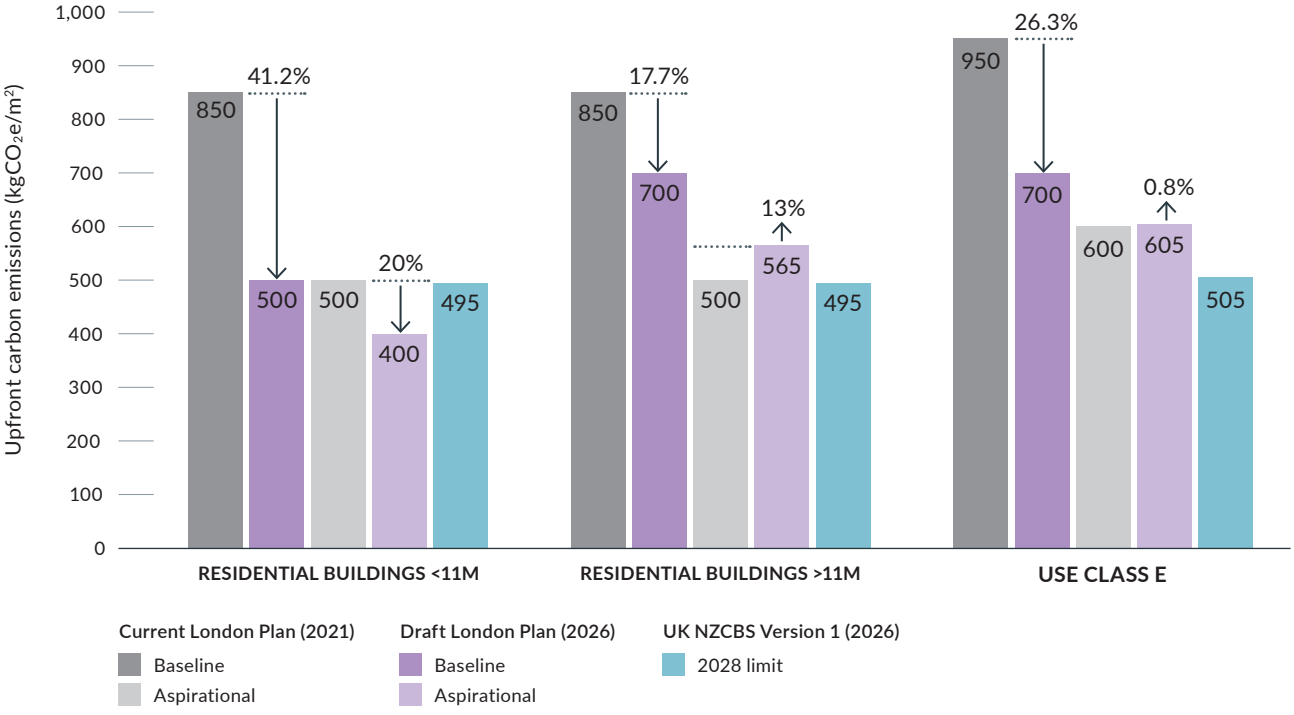
Whole Life Carbon and Circular Economy.

London has been at the forefront of Whole Life Carbon and Circular Economy policy development for several years, with the current London Plan (2021) playing an important role in establishing embodied carbon assessment as a routine part of the planning process. The Draft Plan builds upon this foundation, seeking to improve consistency, strengthen accountability and provide a clearer pathway towards lower-carbon development. While the overall direction remains familiar, the proposed strengthening of upfront embodied carbon targets plus a stronger emphasis on retention reflects the growing maturity of both policy and practice.

Draft Policy GHR3 – Whole Lifecycle Carbon.

The most significant change to the Whole Life Carbon (WLC) requirements within The Draft Plan is the introduction of explicit embodied carbon performance targets for referable applications. While the current London Plan (2021) already uses benchmarking to encourage carbon reduction and inform planning discussions, the draft policy establishes baseline and aspirational upfront embodied carbon targets (RICS modules A1-A5), providing greater certainty around policy expectations and a clearer pathway towards lower-carbon development.

Figure 2: Upfront Embodied Carbon Targets (RICS modules A1-A5) compared to current London Plan (2021) and UK NZCBS 2028 limits



Notes

UK NZCBS limits taken for 'commercial residential' and 'office – shell and core + Cat A scope'

Planning Use Class E allows for many different uses including commercial, business and service uses i.e. offices, shops, food and beverage etc.

The proposed targets represent a tightening of expectations compared with the current London Plan (2021) benchmarks and have been informed by evidence that underpins the UK Net Zero Carbon Buildings Standard (UK NZCBS). Although the proposed targets do not directly align with published UK NZCBS limits, they broadly reflect the performance levels being demonstrated by leading projects. This suggests The Draft Plan is seeking to formalise embodied carbon performance expectations that have already been shown to be achievable while providing a clear signal of the future direction of travel for the wider market.

Approved Document B (Fire Safety) of the Building Regulations introduces requirements for non-combustible materials for residential buildings that are taller than 11m, and more onerous requirements for those that are taller than 18m. This means that at 11m and above, low carbon materials, such as timber frame and cellulose insulation, must be substituted with materials with high fire-resistance, such as bricks and concrete. These materials carry a substantially higher carbon footprint therefore the proposed targets acknowledge this. It is worth noting that all GLA funded projects should apply combustibility restrictions regardless of their height. Where lifts are proposed in a new building, the policy requires that an evacuation lift is provided to allow people who require level access to evacuate from the building safely and with dignity. At the time of writing there is no equivalent requirement to this policy for evacuation lifts in the Building Regulations but, if such a requirement was introduced in the future, this policy would be removed.

Notably, the proposed baseline target for residential buildings above 11m is significantly higher than the equivalent UK NZCBS 2028 limit. This reflects a pragmatic response to regulatory changes that have increased embodied carbon in residential developments, including additional stair core requirements and limitations on the use of lower-carbon façade materials arising from fire safety regulations. It is encouraging to see the evidence base recognising the interaction between competing policy objectives, balancing the need for continued carbon reduction with the practical realities of delivering compliant residential buildings.

Importantly, the supporting evidence base[i] suggests that The Draft Plan targets are generally achievable across residential and commercial typologies. However, the evidence base demonstrates that compliance is unlikely to be achieved through business-as-usual design approaches. The greatest reductions are achievable through structural optimisation, material efficiency, lower-carbon specifications, efficient building forms and early consideration of retention opportunities, rather than through reliance on emerging technologies alone.

This is perhaps the most important conclusion arising from the draft policy. The Draft Plan does not necessarily require radically different buildings. Rather, **it promotes maximising resource efficiency and requires decisions to be made earlier**. Embodied carbon performance becomes increasingly dependent upon concept-stage choices relating to structural strategy, façade design, building form and material selection, reducing the opportunity for significant carbon reductions later in the design process.

While the evidence base demonstrates that many of the proposed targets can be achieved today, they generally reflect current best practice rather than typical market performance. The practical effect of The Draft Plan is therefore to move today's leading projects closer to tomorrow's planning baseline. As industry standards continue to evolve, this creates a clear direction of travel towards increasingly carbon-efficient development.

New build vs. refurbishment

The draft policy does not distinguish between new-build and major refurbishment projects, instead applying a common set of targets to all referable applications. This is a divergence in approach from the UK NZCBS, which does differentiate between the two. The supporting evidence base concludes that major refurbishments and change-of-use projects which are referable often involve a scale of intervention comparable to a new-build development, including substantial demolition, reconstruction or redevelopment behind retained façades. This reflects an intention to focus policy on measured carbon outcomes rather than prescribed development types. Consequently, schemes that retain and reuse significant proportions of existing structures are likely to be well positioned to outperform the proposed targets, while projects involving substantial reconstruction will be expected to demonstrate carbon performance comparable to new-build developments.



Greenwich Meridian Quays
Image: Knight Dragon

Draft Policy GLE11 – Circular Economy.

The Draft Plan builds upon the existing Circular Economy framework while strengthening the expectation that circular economy principles should inform development from the earliest stages of project conception and that referable projects should aim for net-zero waste at the construction stage.

Table 2: Circular economy targets

	Current London Plan (2021)	Draft London Plan (2026)
Demolition (diversion from landfill %)	95%	95%
Excavation (diversion from landfill %)	95%	95%
Construction (diversion from landfill %)	95%	95%
Reused/ recycled content (% by value)	20%	20%

While many of the existing circular economy requirements remain unchanged, **the draft policy places greater emphasis on retention, reuse and adaptability as key drivers of sustainable development**. The strengthened focus on retaining existing buildings aligns closely with the embodied carbon objectives of The Draft Plan and reflects growing recognition that retaining and repurposing existing buildings often represents the most effective opportunity to reduce carbon emissions.

The draft policy also seeks to move beyond waste reduction targets alone by encouraging a more holistic consideration of a building's entire lifecycle. Greater emphasis is placed on adaptability, future flexibility and eventual deconstruction, with development proposals expected to demonstrate how materials and assets can retain value over time. This represents a natural evolution of the current policy, recognising that circular economy outcomes are increasingly linked to whole life carbon performance.

While these principles are widely supported across the industry, there remains an opportunity for future guidance to provide greater clarity around how concepts such as adaptability, flexibility and design for disassembly should be assessed. For example, retrofitting an existing building to meet market expectations (such as BCO guidance) or, future-proofing a building to be adaptable can require a larger quantity of material upfront causing associated waste streams later in the building lifecycle. It could be beneficial to consider the types of buildings that align best with different circular economy approaches to support the overarching policy aims.

Compared with established waste diversion targets, these aspects of circularity remain more subjective and could benefit from clearer performance indicators.

The Draft Plan also acknowledges the relationship between Circular Economy Statements, Whole Life Carbon Assessments and Energy Strategies. These documents are frequently prepared and reviewed independently despite the significant interactions between them. A more integrated approach has the potential to reduce duplication while providing a clearer understanding of overall project performance.

Energy efficiency.

GHR1 Energy Efficiency.

The draft policy seeks to replace the current Part L -based reduction targets (e.g. Be Lean, Be Clean and Be Green) with Energy Use Intensity (EUI) and Space Heating Demand (SHD) targets, distinguishing between baseline and aspirational performance levels.

The change in methodology for calculating operational energy emissions, moving from a Building Regulations compliance-based approach to a CIBSE TM54 'Evaluating Operational Energy Use at the Design Stage' assessment, is a positive step that aligns with the current direction of the industry. Further clarification on the required level of compliance is expected through updated Energy Assessment Guidance (yet to be released), particularly where the SHD target is achieved but the EUI target is not due to factors such as unregulated loads, specialist equipment or other project-specific demands. It will also be interesting to see how the Low Carbon Heat Appraisal interacts with the proposed targets, as the preferred low-carbon and lowest-cost heating solution could influence system efficiency and overall EUI performance.

The current London Plan (2021) is supported by separate Energy Assessment Guidance (EAG, 2022) which provides information on how to comply with the policies and the expected methodology to do so. Given the extent of the changes proposed within the energy policies of The Draft Plan, it is expected that a revised EAG will developed, however the release date is unknown.

Table 3: Space Heating Demand (SHD) targets

kWh/m².yr (GIA)	Baseline	Aspirational
All typologies	20	15

Table 4: Energy Use Intensity (EUI) targets

kWh/m².yr (GIA)	Baseline	Aspirational	UK NZC BS (2028)
Residential	40	35	48 – single family homes 49 – flats
Office	90	70	82
Primary School	40	35	43
Industrial	40	35	37
Hotel	120	80	116
Student Accommodation	65	50	70

The likelihood of achieving the EUI will vary by sector. For example, an office undergoing a NABERS assessment is likely to align well with the draft targets, subject to tenant assessment. In the residential sector, it is less practical to place restrictions on unregulated energy use for leaseholders and tenants, yet The Draft Plan has set a challenging target for this sector that is much more onerous than the UK NZCBS limits.

Benchmarks for uses outside those covered by Building Regulations Part B(1) could benefit from further definition, particularly for mixed-use and non-standard buildings. Consideration could be given to approaches such as blended benchmarks, similar to the CIBSE TM46 ‘Energy Benchmarks’ methodology.

Healthcare buildings

A more specific approach may also be beneficial for healthcare buildings. For example, alignment with NHS Net Zero Buildings (NZB) Standard targets would need to recognise differences in methodology, including that Total Energy Limits are derived from Building Regulations compliance models which exclude certain areas and energy uses.

Renewable energy

The draft policy introduces more explicit requirements to assess competing roof-space demands and prioritise measures according to localised benefits.

Further clarification is required on how roof space should be prioritised between amenity, green roofs and PV. This could consider the UK Net Zero Carbon Buildings Standard minimum PV generation targets and revised Building Regulations Part L requirements, which may significantly influence roof space allocation.

Assessed performance vs actual monitored data.

The term, 'Be Seen' is not used in The Draft Plan, but in-use energy performance monitoring is retained as a requirement.

"To ensure that the policy is effective and that buildings perform as designed, post construction, in-use energy monitoring data should be reported to the GLA for at least five years post occupation in line with energy monitoring guidance. Information reporting requirements for applications will be streamlined and set out in energy strategy guidance."

Until updated Energy Assessment Guidance (EAG) is released, it is unclear whether the design stage modelling outcome would be expected to match the actual in-use recorded energy consumption and if the building owner would be required to investigate any energy performance gap to identify causes and potential remediation.

As the current 'Be Seen' policy appears to have been minimally enforced, with few developers supplying measured energy data to Boroughs or the GLA, without stronger expectations for building owners to report on energy consumption there is a risk that large performance gaps could remain.

Draft Policy GHR2 Low-Cost Low-Carbon Heat

The draft policy includes requirements for Local Plans to identify and set out Heat Network Zones, aligning London planning policy with the new national Heat Network Zoning requirements.

The current London Plan (2021) requires Local Plans to identify existing and proposed heat networks and opportunities for their expansion. However, The Draft Plan introduces a more specific requirement for Local Plans to identify and, where approved, designate Heat Network Zones in line with the new national Heat Network Zoning framework, rather than the existing Heat Network Priority Area (HNPA) approach.

The draft policy seeks to replace the heating hierarchy approach with the Low Carbon Heat Appraisal (LCHA) required for all major developments, introducing a carbon- and cost-based assessment to identify the optimum heating solution.

It is expected that the current EAG will be updated to support the production of LCHAs, to clarify the methodology, including any requirement to estimate energy costs to occupants, and potentially support a more standardised assessment approach to improve comparison between developments

*It is our undersanding that that the National Heat Network Zoning requirement takes precedence where connection is mandated.

Overheating risk and climate resilient design.

The application of the cooling hierarchy through the current London Plan (2021) has encouraged greater consideration of façade design to reduce overheating risk.

Analysis as part of the UK Green Building Council's (UKGBC) Climate Resilience Roadmap indicates that London is at particular risk of overheating due to the Urban Heat Island (UHI) effect. This manifests in higher temperatures, which when projected into future climate scenarios can lead to extreme levels of internal temperature with increasing frequency.

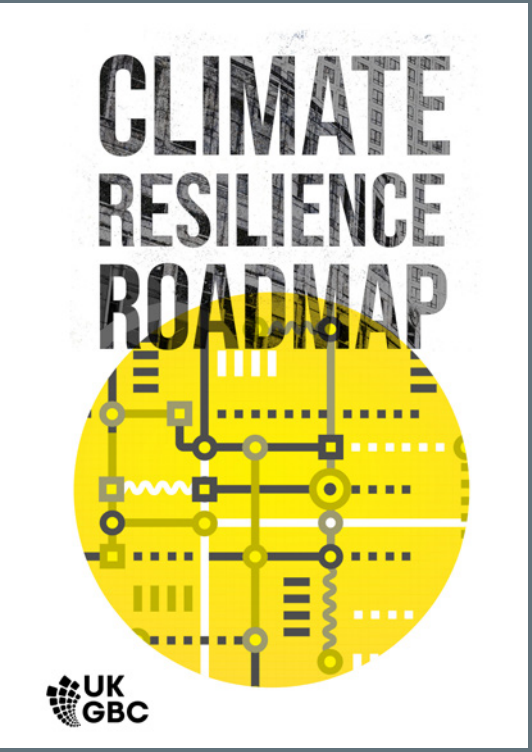
Our analysis of weather profiles utilised by the Building Regulations suggests that they do not adequately reflect climate change and therefore may not effectively facilitate suitable design for thermal comfort. As noted in the consultation, a potential solution is that future climate scenarios are included in the assessment of thermal comfort.

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 been a higher priority than cooling.

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.



Draft Policy GHR4 'Heat Risk' outlines requirements for proposals to minimise contribution to the effect through passive design measures and embedded resilience to future climate change. Mitigation and adaptation will be especially important given references elsewhere in The Draft Plan to increasing the density of development activities and a suggestion of deregulation of smaller sites.

For major developments, applicants should justify how the design maximises passive design measures, and minimises the energy use associated with any cooling, by following a three-stage passive design approach:

1. Limiting solar gains – reduce the amount of heat entering a building through optimising orientation; minimising unnecessary glazing; and providing external shading compatible with window design, high-albedo materials, and blue and green infrastructure.
2. Reducing and removing excess heat – through generous openable window areas and cross ventilation, ceiling fans, mechanical ventilation, and reducing internal heat gains from hot water and heating services.
3. Minimising the need for active cooling (air conditioning).

The Draft Plan states that, "conditions should be used to secure these strategies and features where appropriate".

External shading is expected on facades that receive direct sunlight, ideally with provision for occupant control. The Draft Plan recognises that external shading may not be practical on the upper storeys of tall buildings and acknowledges that other measures might be applied.

Externally mounted moveable shading devices may become more prevalent in façade designs as we adapt to a changing climate. These have the advantage of allowing daylight ingress during periods of cooler weather and lower sunlight availability, while allowing effective shading during warmer episodes. Currently, new homes with moveable external shading are generally limited to high value properties whilst the affordable end of the market often struggles with viability constraints. Consequently, the supply chain is immature in the UK due to limited demand. Encouraging more widespread use of external moveable shading in response to our changing climate could help to grow the market for these features.

Dynamic thermal modelling

Dynamic overheating risk assessment (following guidance in CIBSE TM59 'Overheating Risk in Dwellings – a Design Stage Methodology and CIBSE TM52 'The Limits of Thermal Comfort: Avoiding Overheating' for residential and non-residential buildings, respectively) must be provided and should account for the potential contribution from design, layout, orientation, materials, shading and the incorporation of green infrastructure. Active cooling is not precluded, but if the assessment does not show a need for it, then applicants should demonstrate that all feasible passive measures have been included to minimise energy costs and to provide a comfortable space for occupants who don't wish to use (or cannot afford) active cooling. Systems should avoid purging hot air close to residential buildings and amenity spaces. The Good Homes Alliance (GHA) early stage overheating risk tool checklist remains cited as a submission requirement.

CIBSE TM59 Overheating Risk in Dwellings – a Design Stage Methodology (2026).

CIBSE recently updated their TM59 guidance which has been in use since 2017. The main amendment is the use of 2025 weather files which use the DSY1 2050 High50 weather scenario to enable more precise modelling based on 28 climate regions instead of 16 specific location files (London, Manchester etc.). This means that buildings will need to demonstrate their resilience to significantly higher external ambient conditions and increased solar irradiance levels.

New criteria include a requirement for naturally and mechanically ventilated bedrooms to not exceed 27°C (26°C for vulnerable occupants) for more than 4 nights between 1 May and 30 September.

One of the main changes is the inclusion of ceiling fans as an enhanced passive heat mitigation measure. The new guidance suggests that a minimum floor-to-ceiling height of 2.4m would be necessary for ceiling fans to be feasible. This aligns with The Draft Plan which reduces the minimum floor to ceiling height from 2.5 to 2.4m.

The updated CIBSE guidance is effective immediately and while the latest weather files are more representative of the environment that we are currently living in, uncertainty remains over short and medium-term projections, especially in light of the extended periods of extreme heat felt during the summer months of 2026. If we are to experience more frequent periods of extreme heat, then it is likely that policy will also need to be updated more frequently to support resilient design responses.

Building Regulations Approved Document O 'Overheating', which was first introduced in 2021, is currently undergoing a full technical review following a call for evidence during the recent consultation on the Future Homes and Buildings Standards. The consultation responses indicated that the current two-tiered compliance approach (simplified or dynamic thermal modelling method) is not working and highlighted conflicts with other parts of the Building Regulations. The technical review is expected to cover the following workstreams:

- Adoption of the 2026 CIBSE TM59 methodology for dynamic thermal modelling rather than the 2017 edition currently referenced.
- Improvements to the simplified method to address gaps in evaluating performance of passive design measures.
- Review of night-time ventilation assumptions to reconcile the approach with guidance for noise and security set out in Approved Document F 'Ventilation' and Approved Document Q 'Security in Dwellings'.
- Consideration of extending Approved Document O 'Overheating' to include material change of use dwellings and large domestic extensions and conversions.
- Updated weather files.

There is currently no known timeline for when a revised Approved Document O will be published.

Daylight and overheating.

Good daylighting in homes is crucial for health and wellbeing, as well as being a key component of decent and good quality homes. Light is the primary mediator of our circadian rhythms or 'body clock'. Exposure to bright, broad-spectrum light in the early part of the day (which natural light provides) and limited light exposure at night are both essential for a healthy body clock, leading to a wide range of positive health outcomes. Most notable of these is sleep quality, which affects almost every other aspect of mental and physical health. Poor light exposure in the daytime (and a lack of darkness at night) can lead to disordered sleep and a variety of short- and long-term health impacts[ii]. In addition, there is evidence that daylight exposure plays a key role in children's visual and cognitive development[iii]. Finally, it is understood that exposure to the infrared and near-infrared wavelengths present in natural light are essential for a wide range of processes in the body including cell regeneration and blood sugar regulation[iv].

It is common practice for multi-home developments to be consented where a proportion of homes do not meet the guidelines. This is an unintended consequence of guidance based on a single target, leading to a pass/fail evaluation. The whole development is considered in terms of what proportion of rooms meet guidelines for daylight. Added to this, homes in which daylight is compromised tend to be those on lower floors, with greater overshadowing and a generally poorer outlook. Given that homes on lower floors may be more likely to be occupied by people with additional mobility needs, this contributes to inequality of access to daylight.

Dual-aspect homes provide better daylight distribution in rooms and allow cross-ventilation. In recent heatwaves, external air temperatures have meant that natural ventilation is not sufficient to control overheating and mechanical ventilation and/or trim cooling is required to support occupant comfort. Despite this shift to mechanical solutions, the principle of dual-aspect homes can still be applied to support a mixed-mode strategy and to ensure that residents benefit from good daylighting.



Greenwich Meridian Quays
Image: Knight Dragon

Delivering development density without compromising daylight

The Draft Plan proposes to enable more mid-rise and tall buildings based on contextual factors, for example by setting out heights that should be acceptable in different areas of London. It is suggested that this will help meet London's housing need, however it should be acknowledged that increased density brings increased pressure on natural light in existing as well as new homes.

The current BRE guidance (BR209 'Site Layout Planning for Daylight and Sunlight: a Guide to Good Practice, 2022') can be interpreted flexibly, meaning that daylight studies submitted with applications often use alternative methods to determine how much light in existing homes is reduced by a new building. The most common method is the 'mirror massing' approach, which models the baseline scenario with a building on the site of the same mass as surrounding buildings. Even though this new baseline is only theoretical, it can be presented in a way that suggests a reduction in light incurred by the new building that is much less significant than in reality. The method was proposed by BRE as a way to approach sites where there is a prevailing height and scale of buildings and under special circumstances, showing how a development of an existing site in line with surrounding buildings would affect existing ones.

In the context of meeting London's housing need, this issue needs to be addressed in a pragmatic way, but it is vitally important that daylight in existing homes is not unduly harmed by new developments. Therefore, **we suggest that the future London Plan offers clear guidance on how to determine levels of acceptable loss of daylight and sunlight to existing homes and does not simply refer to BRE guidance**.

Place-based approach.

Healthy communities.

The Draft Plan proposes that health, safety, and wellbeing are woven throughout new policies. This includes "designing decent, good quality homes for those who need them" and "measures to reduce inequalities to enable healthy lives, promote good health and prevent ill health."

Draft Policy GHR8 'Accessible Green Space' sets a clear, no net loss approach to Accessible Green Space (AGS), identifying the need to improve access to green space for all, crediting its role in supporting physical and mental health, reducing health inequalities, mitigating flood and heat risk and improving quality of life.

Draft Policy GHR6 'Trees, Biodiversity and Geodiversity' supports strategic planting of climate resilient species and trees with larger canopy cover to both increase Urban Greening Factor (UGF) scores and provide shading in heat-vulnerable neighbourhoods.

Together these two policies provide an example of how climate resilience is woven into The Draft Plan with a strong emphasis on mitigating and adapting to climate change.

Local AGS standards are not only applied to residential development but also to offices, healthcare and visitor facilities that significantly increase the number of people visiting or living in those areas.

Where opportunity for new AGS is limited, "multi-benefit greening" such as Sustainable Urban Drainage Systems (SuDS), street trees and improvements to walking and cycling routes would be acceptable. Improvements to the connectivity of green infrastructure is encouraged; including cross-boundary strategic working where that is useful, to support low-cost active travel, provide rest spots and connect wildlife corridors.

The Green Belt.

Draft Policy PV7 'Sustainable Development and Enhancement of the Green Belt' is intended to protect and enhance as much Green Belt as possible but does permit the release of Green Belt land where assessed needs cannot be met through other means. This is aligned with the NPPF, with both documents recognising the importance of the Green Belt classification to avoid urban sprawl but acknowledging that its current implementation blocks necessary development. The policy identifies well-connected, broad locations for growth – for housing, industrial storage and distribution – and opportunities to improve access to nature, green infrastructure and biodiversity.

This is part of a range of proposed land re-classification including releasing industrial land in urban areas for housing.

Another example of reclassification is Draft Policy PV2 'Central Activities Zone' (CAZ) which outlines an amended approach to distinguish between 'core' and 'mixed' CAZ areas. In 'core' areas, priority is given to commercial, cultural and experience economies. 'Mixed' areas will create the potential for new development to create more mixed commercial/ residential character areas complemented by social infrastructure. This shift is deigned to intensify business functions and activities within the core CAZ areas, to sustain and enhance the vibrant core of London, while creating multi-purpose neighbourhoods in the mixed CAZ.

Data centres.

The most notable addition to The Draft Plan is policy GLE3 'Data Centres' which directly addresses the scale of AI-driven data centre growth since 2021. The policy is proposed to help identify the most suitable locations for new data centres recognising their considerable land and resource demands as well as their impact.

The draft policy sets locational criteria based on electricity and water capacity, requires proactive plan-making to identify suitable sites (with 'Grey Belt' or Green Belt edge locations only as a fallback where no brownfield sites are available), and sets sustainability requirements including coordinated heat-recovery infrastructure informed by a waste-heat utilisation plan, water and electricity efficiency measures, on-site or nearby renewable generation where feasible, and tight controls on back-up generator testing and emissions (including screening against impacts on Epping Forest Special Area of Conservation).

Utilities.

The current London Plan (2021) addresses energy, water and digital infrastructure through separate policies (SI3 'Energy Infrastructure', SI5 'Water Infrastructure', SI6 'Digital Infrastructure').

Draft Policy MBUL4 'Utilities Capacity, Connectivity and Resilience' brings these together into a single consolidated policy that requires applicants to look beyond immediate site needs and issues of capacity, asking them to incorporate water efficiency standards and other demand management expectations. The policy references Local Area Energy Plans (LAEPs), the Regional Energy Strategic Plan, and the government's Heat Network Zoning Model, setting out a table of engagement thresholds with grid operators (the National Energy System Operator, Distribution Network Operators, and Zone Coordination Bodies) by development scale and location.

This policy goes beyond the NPPF to address particular issues in London including the erosion of digital activity and the management of electricity capacity and resilience.

It recognises that better engagement and partnership working is required between utility providers, developers, planners to provide an infrastructure-planning-led approach to energy capacity.

Air Quality.

Ambitious policy requirements in London have driven improvements in air quality in recent years. The Draft Plan signals a more streamlined and health-led approach to air quality. For development proposals air quality assessment will remain a key part of planning, but the emphasis is shifting towards stronger evidence, clearer benchmarks, and integrated design consideration.

The Draft Plan places stronger emphasis on using air quality evidence to inform the location, layout and design of proposals. Assessments should consider nearby roads and other emission sources, existing pollution levels, sensitive receptors and any identified 'areas of concern'. They should then explain how these factors have influenced the positioning of sensitive uses (such as homes), design of openable windows, location of air intakes, balconies, play areas and communal amenity spaces.

'Areas of concern' include Air Quality Management Areas (AQMAs) and the Central Activities Zone (CAZ) but may also be identified by Local Plans. These may relate to habitat vulnerabilities e.g. Epping Forest SAC and those areas where pollution levels are within 5% of national limits of World Health Organisation (WHO) air quality guidelines.

It is also possible that the move towards achieving the WHO guidelines for air quality could have significant implications on what is considered compliant within the design and operation of new developments. For example, this may include acceptability of natural ventilation or the level of filtration required, which may impact energy demand and operational costs. Developments within newly identified 'areas of concern' are likely to require greater design input from air quality specialists at an early stage to ensure compliance and limit the influence of poor air quality.

All developments will need to continue to demonstrate that they are at least 'Air Quality Neutral' in line with the current London Plan (2021). Major developments will be required to show that they are 'demonstrably' better than 'Air Quality Neutral', however there is no clear guidance at this stage how this will be determined. Development proposals that are subject to Environmental Impact Assessment, where air quality is in scope, are expected to contribute to additional air quality improvements proportionate to their scale and impact i.e. 'Air Quality Positive'.

The Draft Plan specifies that, where feasible, zero-emission options for energy supply and backup power should be prioritised for all new developments. Where this is not possible and generators are considered the most feasible option, emissions should be minimised by meeting EU 'Stage V' emissions standards as a minimum or by demonstrating equivalent emissions performance from start-up using approved emissions-abatement technology. This is a more stringent requirement than the current London Plan (2021). As such, allowance should be made by developers for the potential cost and space requirements associated with 'Stage V' compliant equipment, approved abatement systems, earlier consideration of exhaust stacks and emissions monitoring.

Acoustics.

The Draft Plan represents more of an evolution than a fundamental change in policy. While the dedicated noise policy contained within the current London Plan (2021) has been removed, its principles have been integrated more broadly throughout The Draft Plan and the underlying objectives remain largely unchanged.

Development proposals will still be expected to demonstrate good acoustic design, ensuring that noise impacts are appropriately managed and that suitable acoustic environments are provided for future occupants, neighbouring receptors and the wider community.

Generally, The Draft Plan focuses on outcomes rather than prescriptive policy requirements which provides Boroughs with increased flexibility to interpret and apply acoustic considerations in a manner that reflects local priorities, character and community needs.

In practice, we do not anticipate a significant change in the level of acoustic assessment or mitigation typically required to support development proposals. However, greater emphasis may be placed on demonstrating how acoustic design contributes to broader placemaking, health and wellbeing objectives.



Thameside West
Image: Silvertown Homes Ltd. / Arada London, image produced by Bloomimages

Draft London Plan (2026). Summary.

A core vision for the future London Plan is to provide a framework for Good Growth, which delivers fair and inclusive economic growth through infrastructure and housing in climate-resilient and healthy places.

The proposed changes to Whole Life Carbon and Circular Economy policy share a common theme. Both seek to move sustainability considerations further upstream in the development process, with increasing emphasis on early-stage decision making rather than post-design assessment. This will bring more significance to the need for pre-development and pre-demolition advice to support early-stage decision making.

The evidence base demonstrates that the proposed upfront embodied carbon targets are achievable, but not through business-as-usual approaches. Success is increasingly likely to depend upon:

1. Leaner and more materially efficient building designs
2. Earlier consideration of structural and façade strategies
3. Greater certainty around material specification and procurement
4. Increased evaluation of retention and reuse opportunities
5. Stronger integration between carbon, energy and circular economy objectives

The Draft Plan recognises that re-using existing buildings and structures will reduce embodied carbon emissions so should be prioritised before considering substantial demolition. However, this approach must not prevent developers from taking opportunities to optimise site capacity and deliver appropriate redevelopment in support of other strategic spatial policies. In such cases, the embodied carbon benefits of building retention should be compared with the operational carbon associated with operational energy consumption over the building lifetime.

The new requirement for a Low Carbon Heat Appraisal replaces the current 'Energy Hierarchy' with a technology-agnostic framework to demonstrate incorporation of the lowest carbon and cost option. This should resolve common issues with applications that are technically not policy-compliant even though they have been designed to deliver the most energy and carbon efficient solutions

The Draft Plan continues to require opportunities for the provision of renewable energy to be 'maximised'. This approach is especially challenging to demonstrate on high-rise residential schemes and does not align with Part L 2026 which exempts tall buildings.

The Energy Use Intensity approach differs from Building Regulations Approved Document L but aligns with current and emerging guidance from professional institutions (e.g. UK NZCBS, LETI, Better Buildings Partnership etc.) suggesting a divergence between industry and regulation.

Embodied carbon has become a larger proportion of the carbon emissions associated with the built environment. However, we should not assume that the operational energy puzzle is solved; the targets proposed in The Draft Plan are challenging and remain focused on design stage assessment and reporting as opposed to verified operational outcomes.

An area of strength in The Draft Plan appears to be its support for climate-resilient design, particularly in response to extreme weather conditions. Passive design measures for buildings and associated public realm have been woven into policies through requirements to increase green spaces, tree canopy cover and blue infrastructure to mitigate the Urban Heat Island effect and support for external shading devices on windows and ceiling-mounted fans in rooms to reduce internal gains. The expectation is that design teams will need to embed thermal comfort measures into their designs from the outset.

The future London Plan is a significant opportunity to improve the way daylight guidance is applied in multi-home developments. For example, a sliding scale approach, rather than a single target approach, could be used to encourage quality of daylight instead of target-chasing. In addition, a more nuanced approach to the provision of private balconies could be adopted. A balcony may reduce daylight ingress in rooms due to increased depth and overshadowing of the room below, and as a result current daylight guidance is either agnostic or negative in how balconies are considered. In a sliding scale model, credit could be given for the provision of balconies, allowing a balance between the benefits of having a balcony and the reduction of daylight that may result.

Future London Plan.
Conclusion.

Does the streamlined Draft London Plan meet its ambitions to remove unnecessary burdens and accelerate development where is it needed?

Quite possibly. But the biggest risk appears to be its disconnect with the new NPPF and the latest Building Regulations. It is clear that London, as an international city, wants to lead the rest of the UK. However, the industry might be better supported by an approach that offers some alignment to reduce uncertainty and duplicity of approaches.

Could performance betterment be encouraged against the framework of the National Planning Policy Framework (NPPF) requirements?

This could be a policy to assess Energy USe Intensity (EUI) and Spacing Heat Demand (SHD) with reporting against the targets, but not necessarily a firm requirement to meet these targets. This suggestion is not to stifle ambition, but to avoid the scenario where planning committees reject proposals on the basis of a 'failed' EUI assessment, only for this to be appealed and overturned because it is not in accordance with the NPPF.



Capella, King's Cross
Photo: Billy Bolton for Allied & Morrison

Draft London Plan (2026). Glossary.

AD	Building Regulations Approved Document
AGS	Accessible Green Space
AQMA	Air Quality Management Area
BBP	Better Buildings Partnership
BCO	British Council for Offices
BRE	Building Research Establishment
CAZ	Central Activities Zone
CIBSE TM	Chartered Institute of Building Services Engineers Technical Memoranda
DSY	Dynamic Simulation Year (weather file)
EAG	Energy Assessment Guidance
EUI	Energy Use Intensity
GHA	Good Homes Alliance
GLA	Greater London Authority
HNPA	Heat Network Priority Area
LCHA	Low Carbon Heat Appraisal
LEAP	Local Area Energy Plan
LETI	London Energy Transformation Initiative
MHCLG	Ministry for Housing, Communities and Local Government
NABERS	National Australian Built Environment Rating System
NPPF	National Planning Policy Framework
NZC	Net Zero Carbon
PTAL	Public Transport Accessibility Level
PV	Photovoltaic panels
SAM	Sustainable Access Measure
SHD	Space Heating Demand
SuDS	Sustainable Urban Drainage Systems
TfL	Transport for London
UGF	Urban Greening Factor
UHI	Urban Heat Island effect
UKGBC	UK Green Building Council
UK NZCBS	UK Net Zero Carbon Building Standard
WHO	World Health Organisation
WLC	Whole Life Carbon

Notes

i https://data.london.gov.uk/download/2yoq5/127/LPNZ%20Evidence-Embodied%20carbon.pdf

ii e.g. Aries M, Aarts M, van Hoof J. Daylight and health: A review of the evidence and consequences for the built environment. Lighting Research & Technology. 2013;47(1):6-27

iii e.g. Westwood, Emily, et al. "The effects of light in children: A systematic review." Journal of environmental psychology 89 (2023)

iv e.g. Powner, Michael B., and Glen Jeffery. "Light stimulation of mitochondria reduces blood glucose levels." Journal of Biophotonics 17.5 (2024) and Shinhmar, Harpreet, Chris Hogg, and Glen Jeffery. "Long wavelength light that improves aged mitochondrial function selectively increases cytokine expression in serum and the retina." BioRxiv (2021)

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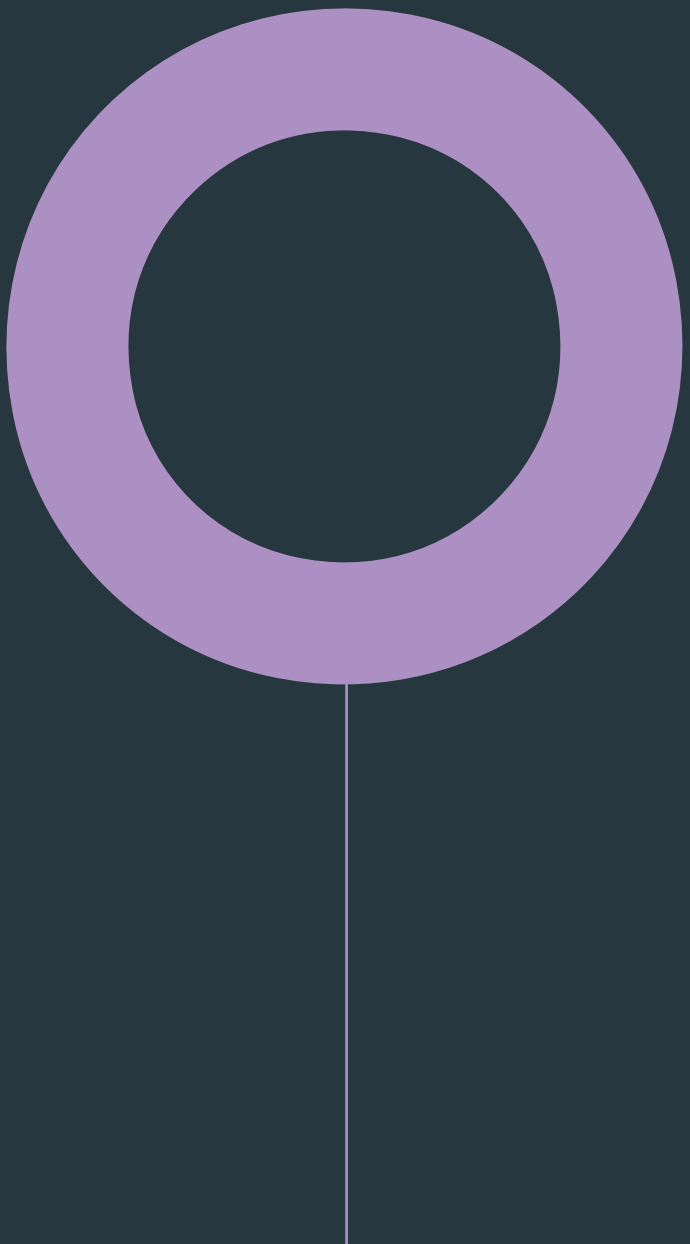
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