

Draft London Plan Consultation
Response from Propertymark
October 2026

Background

1. Propertymark is the UK's leading professional body for estate and letting agents, property inventory service providers, commercial agents, auctioneers and valuers, comprising 19,000 members representing over 12,800 branches. We are member led, with a Board made up of practising agents, and work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry leading training programme and mandatory Continuing Professional Development.¹

Overview

2. The Mayor of London is consulting on the Draft London Plan 2026, which sets out how London is proposed to grow and develop, covering housing, economic growth, transport, infrastructure, the environment, design and the use of land across Greater London. A key aim is to increase housing supply, with the Plan identifying capacity for around 558,000 new homes between 2027 and 2037, while also increasing affordable housing, making better use of brownfield land and ensuring new development is supported by the infrastructure needed to serve growing communities.
3. Alongside housing, the Plan aims to support London's economy and create greener, healthier and more resilient places. This includes supporting employment and commercial space, improving transport and utilities, protecting green infrastructure and heritage, reducing carbon emissions, managing flood and heat risks, improving air quality and encouraging high-quality design. The consultation is intended to gather views from residents, businesses, local authorities and other organisations before the Plan is examined and ultimately adopted as the strategic planning framework for London.

Propertymark response to the Draft London Plan 2026

4. We welcome the opportunity to respond to the Draft London Plan 2026. Our response has been informed by discussions with members working across London's sales, lettings, property management, development and commercial property sectors, together with our wider policy and market evidence.
5. Propertymark supports the overall ambition to increase housing supply, support economic growth, make better use of land and create greener, more resilient and attractive places. London faces significant housing and affordability pressures, and our members consistently report that demand continues to exceed supply. However, the success of the London Plan will depend on whether its ambitions can be delivered in practice. The Plan should distinguish between theoretical capacity and development that is genuinely viable, funded, consented,

¹ <https://www.propertymark.co.uk/>

built and occupied. This means giving proper consideration to infrastructure capacity, development finance, construction costs, planning delays, market demand and the contribution that existing housing and commercial stock can make.

6. We also think that the private rented sector should have a more prominent role in the Plan. Our previous evidence to the Mayor highlighted the importance of the private rented sector (PRS) in meeting London's housing demand and the risk that competing policy requirements could make housing delivery more difficult. Across the Plan, we therefore support the overall direction but think a number of policies need to be changed to improve their viability, flexibility and deliverability.

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

MBUL1 Spatial Strategy

7. We do not think this policy is sound as drafted. We support the focus on sustainable locations and the use of brownfield land. However, members are concerned that housing growth could be planned without enough consideration of whether the infrastructure needed to support it is actually available. Infrastructure such as drainage, sewer capacity, transport, schools and other local services needs to be considered alongside housing delivery, with flood risk also a particular concern in some areas.
8. We think that the Plan should be clearer about who is expected to fund and deliver infrastructure and when it needs to be in place. Growth should be phased where necessary rather than assuming infrastructure will follow development. The Mayor should also monitor not just planning permissions but starts, completions, build-out rates and actual occupation. The existing housing stock, including privately rented homes, should also be recognised as part of London's housing capacity.

MBUL2 Optimising the use of land and site capacity

9. We do not think this policy is sound as currently drafted. We support making better use of land and encouraging development on smaller sites. However, optimisation should not become a requirement to maximise density regardless of viability, infrastructure, local character or demand. Members are seeing pressure on development margins from construction costs, finance costs and planning delays, and requiring increasingly high densities can make schemes more difficult to finance and reduce the number of developers able to take projects forward.
10. The Plan should support smaller developers and make requirements proportionate to the size and complexity of a scheme. Faster and more certain planning decisions would also help. There is also scope to make better use of existing buildings and underused commercial premises where conversion or redevelopment is appropriate.

MBUL3 Tall buildings

11. We do not think this policy is sound as drafted. We recognise that tall buildings will have a role in meeting London's housing needs, particularly in areas with good transport links. However, height should not be treated as an answer to housing delivery in itself. Members question who will finance and deliver some of the taller schemes being proposed and whether the supporting infrastructure will be sufficient. Tall buildings also need to provide attractive, durable homes and places that people will want to live in over the long term. There is currently little emphasis on the attractiveness and appropriateness of tall buildings within the plan.
12. The Plan should give greater weight to viability, infrastructure, design quality, maintenance and local character. Increasing the number of units should not come at the expense of the quality or longevity of the development.

MBUL4 Utilities, capacity, connectivity and resilience

13. We think this policy is sound. It is important that development is supported by adequate utilities and infrastructure, and the policy provides a useful basis for ensuring that growth does not take place without considering capacity and resilience.

MBUL5 Sustainable transport to enable London's growth

14. We think this policy is sound. We think that good transport links are essential to housing and economic growth. New development should be located where people can access employment, services and public transport, while recognising that transport investment needs to keep pace with planned growth. However, we also think that adequate infrastructure needs to be put in place before increased residential or as soon as possible.

MBUL6 High quality design for a growing, changing city

15. We think this policy is sound. We support the emphasis on good design. Members particularly stress the importance of creating attractive places with character rather than simply delivering high numbers of units. Good design should also consider how buildings will be maintained and how well they will work for residents over time.

MBUL7 London's Heritage

16. We think this policy is sound and we also think that London's existing buildings and character are important assets. Furthermore, we think Heritage should be protected while allowing appropriate buildings to be adapted and brought back into use where possible.

MBUL8 Inclusive design

17. We think this policy is sound. We think that buildings and public spaces should work for a wide range of people. Inclusive design is particularly important as London's population changes and more people require accessible homes and services. However, we would like to see a greater emphasis on lifetime homes. Not only are these types of homes cheaper to adapt as people's needs change but they reflect the lifestyles as people's needs change.

MBUL9 Healthy streets and public realm

18. We think this policy is sound. We think that good streets and public spaces are an important part of creating successful neighbourhoods. They should support walking, transport, community life and access to local services. We also recognise the role that small businesses could play in these spaces to develop a sense of community and hubs.

MBUL10 Security and safety

19. We think this policy is sound and we support the inclusion of security and safety in the design and planning of new development. These issues should be considered from the start rather than added later.

Chapter 3: Delivering the homes and neighbourhoods Londoners need

HN1 Increasing London's housing stock

20. We do not think this policy is sound as drafted. We support the ambition to increase London's housing supply. However, our members are concerned about the difference between the number of homes identified as possible through planning and the number that will actually be built and occupied. The 558,000-home target is ambitious, but the Plan needs to recognise the practical barriers to delivery, including viability, finance, construction costs, planning delays, labour costs and market demand.
21. There also needs to be greater clarity about who is expected to deliver the homes and how they will be financed. The Plan should monitor starts, completions, build-out rates, tenure, affordability and occupation rather than relying mainly on theoretical capacity. Existing homes must also be part of the picture, as protecting the private rented sector and making better use of existing buildings can contribute to housing supply much more quickly than new construction.

HN2 Protecting and reshaping housing

22. We do not think this policy is sound as drafted. We support the principle of protecting London's existing housing stock. However, the policy needs to recognise the changing private rented sector and the effect that wider housing and rental regulation can have on the availability of homes. Members are seeing private landlords reconsidering whether to remain in the market, which makes it particularly important to monitor changes in the PRS, vacant homes, Local Housing Allowance availability and the number of homes being brought back into use.
23. Our members have evidence that some empty homes are also not always straightforward to bring back into use. Ownership issues, condition, finance and the resources available to local authorities can all be barriers, so councils need the staff, expertise and funding to deal with these cases effectively.

HN3 Delivering affordable housing

24. We do not think this policy is sound as drafted. We support the need for more genuinely affordable and social housing. However, the policy needs to take greater account of the financial reality of development. Affordability should be considered against local incomes, rents, Local Housing Allowance levels, service charges and the wider cost of living. Members report particularly strong pressure in parts of East London where there is a shortage of properties available within Local Housing Allowance levels.
25. We think the proposed affordable housing requirements also need to be tested against development viability. If requirements make schemes unviable, the result may be fewer homes overall. The Plan should also support smaller sites and smaller developers, where proportionate affordable housing requirements could help bring forward a wider range of sites.

HN4 Gypsy and Traveller Accommodation

26. We think this policy is sound. We support the principle of ensuring that there is sufficient appropriate accommodation for Gypsy and Traveller communities and that needs are properly assessed.

HN5 Managing specialist accommodation

27. We think this policy is sound as drafted. Our members recognise, that like most places across the UK, London needs more homes suitable for older people and those requiring specialist or supported accommodation. Members report that many older people remain in large homes because suitable smaller homes are not available. More attractive downsizing options, including lifetime homes and schemes with good communal areas, could help people move while also releasing larger homes for other households. We also think that specialist housing should be properly connected to transport, shops, health services and community facilities.

HN6 Build to Rent

28. We do not think that this policy is sound as drafted. We recognise that Build to Rent can make a contribution to London's housing supply and can help bring forward development at scale. However, build to rent should not be treated as a complete replacement for the traditional landlord operating in the PRS. Members are seeing private landlords leave the market in London, including in areas where there is already strong rental demand, while Build to Rent tends to operate at a different scale and can serve different parts of the market. We think the Plan should therefore monitor the overall supply of rented homes, not simply the growth of Build to Rent. It should also consider rents, service charges and the range of households actually able to access these homes.

HN7 Housing size mix

29. We think this policy is sound. We support a flexible approach to housing size. London's need for one and two-bedroom homes needs to be recognised, but there must also be sufficient family-sized homes. The mix should reflect local circumstances, affordability, transport and access to services. Smaller homes should not simply be used to maximise unit numbers where

this creates overcrowding or poor living conditions, and the needs of older people who want to downsize should also be considered.

HN8 Housing design

30. We think this policy is sound. We support the emphasis on high quality housing. Good natural light, ventilation, privacy, outdoor space and well-designed communal areas all contribute to homes that people can live in comfortably for the long term. Members also stress the importance of durable buildings that are not excessively expensive to maintain.

HN9 Accessible housing

31. We think this policy is sound. We support the provision of accessible and adaptable homes. We recognise that London's ageing population means this will become increasingly important.
32. We are in the process of writing a position paper on accessible housing and will share with the Mayor's office when published.

HN10 Burial space

33. We think this policy is sound. We support and recognise the need to plan for burial space as part of London's long-term land and infrastructure requirements.

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

GLE1 Sufficient and appropriate employment space

34. We do not think this policy is sound as drafted. We support the need for employment space, but the policy should be flexible enough to respond to changes in demand. Members report uncertainty in parts of the commercial market, including changing office requirements and pressure on businesses. Employment land should be protected where there is clear demand, but planning policy should not prevent appropriate alternative uses where premises are no longer viable.

GLE2 Supply of industrial land

35. We do not think this policy is sound as drafted. We recognise that industrial land remains important to London's economy, but we think the policy needs to recognise that land values and demand vary considerably across London. Where industrial land is genuinely underused or no longer viable, there should be scope for a balanced approach which considers employment, housing and other local needs.

GLE3 Data centres

36. We think this policy is sound and recognise that data centres are an important part of London's digital infrastructure. We support appropriate planning controls which consider energy, water, infrastructure and environmental impacts.

GLE4 Night-time economy

37. We think this policy is sound. We support the protection and responsible growth of London's night-time economy. Planning should recognise the contribution these businesses make to local economies and employment.

GLE5 Culture and creative industries

38. We think this policy is sound and recognise London's cultural and creative sectors are an important part of the city's economy and identity. We support policies which allow these sectors to grow while recognising local impacts.

GLE6 Visitor infrastructure

39. We think this policy is sound. We recognise that visitor infrastructure supports London's wider economy. We also recognise that appropriate planning for hotels, visitor accommodation and related facilities should form part of the city's growth strategy.

GLE7 Affordable workspace

40. We do not think this policy is sound as drafted. We support the principle of supporting smaller businesses and organisations that cannot afford high commercial rents. However, the policy needs to recognise the financial impact of additional requirements on development. Affordable workspace should be based on clear local need and should not make otherwise viable schemes unviable.

GLE8 Access to employment and skills

41. We think this policy is sound. We support measures which improve access to employment, skills and training. Development should provide opportunities for local people where appropriate. However, greater consideration should be given to access to employment opportunities and residential sites and accessibility.

GLE9 Aviation

42. This is outside the remit of Propertymark.

GLE10 Safeguarded Wharves

43. This is outside the remit of Propertymark.

GLE11 Circular economy

44. We think this policy is sound. We support greater reuse of materials and more efficient use of resources. This should be encouraged in a way that remains practical and proportionate for developers.

GLE12 Waste

45. We think this policy is sound. We acknowledge that London needs sufficient waste infrastructure to support population and economic growth. Planning should make sure that capacity keeps pace with development.

GLE13 Aggregates and mineral resources

46. We think this policy is sound. We support the protection and responsible management of mineral resources where they are needed for London's construction and infrastructure.

Chapter 5: Creating a greener, resilient and healthy city

GHR1 Energy efficiency

47. We do not think this policy is sound as drafted. We support improving energy efficiency, but the requirements need to reflect the cost and practical difficulty of upgrading different types of buildings. Members are particularly concerned about older properties, where improvements can be expensive, technically difficult and sometimes constrained by the age and construction of the building. We think requirements should therefore be proportionate and take account of viability, building type and the ability of owners to carry out the necessary works. There should also be greater recognition of the financial support already available, including the Warm Homes: Local Grant, which can support energy efficiency improvements in eligible privately owned and privately rented homes in London.
48. We would like the Plan to take a practical approach which encourages improvements without placing costs on property owners that they cannot reasonably meet. This is particularly important in the private rented sector, where additional costs can affect whether private landlords remain in the market or are able to invest in existing properties. The Plan should encourage access to available funding and ensure that future requirements are introduced alongside realistic financial support, rather than assuming that all owners can fund improvements themselves.

GHR2 Low cost, low carbon heat

49. We do not think this policy is sound as drafted. To be clear, we support lower carbon heating, but the policy needs to recognise the cost of installation and the suitability of different systems for different buildings. Heat pumps and other low-carbon technologies will not be equally suitable for every property, particularly older buildings, and the cost of installation can be significant. The Boiler Upgrade Scheme provides support towards the upfront cost of eligible heat pump installations but grant funding does not necessarily cover the full cost of the work.
50. We therefore think requirements should be proportionate, take account of the condition and type of the building, and allow for circumstances where a particular heating system is not technically or financially suitable. Requirements should not result in homes becoming unaffordable or properties being left empty because owners cannot finance the required improvements. The London Plan should also recognise the importance of aligning new requirements with existing and future government funding, so that property owners have a realistic route to meeting the policy rather than simply facing additional costs.

GHR3 Whole life-cycle carbon

51. We do not think this policy is sound as currently drafted. We support consideration of carbon over the whole life of a building, but the requirements need to be proportionate and practical. The Plan should recognise the carbon and financial benefits of retaining and adapting existing buildings where this is appropriate, rather than assuming that replacement is always preferable. A fabric first approach should also be encouraged, with improvements to insulation, windows, ventilation and the building envelope considered before more expensive or complex technologies are required.
52. This is particularly important for London's older housing stock, where the most appropriate solution will vary depending on the age, construction and condition of the property. We think the policy should allow flexibility where a fabric first approach can deliver meaningful improvements without imposing disproportionate costs or creating unintended consequences for the building. Retaining and improving existing properties can support both carbon reduction and the continued supply of homes, including within the private rented sector.

GHR4 Heat risk

53. We think this policy is sound. We support measures to reduce overheating and improve resilience to increasing temperatures, particularly in homes and buildings where residents may be more vulnerable. The policy should also complement existing housing standards, including the Decent Homes Standard (DHS) and the Housing Health and Safety Rating System (HHSRS), which already provide a framework for considering hazards and the condition of residential properties.
54. Additionally, we think the Plan should encourage practical measures that can reduce heat risk, including good ventilation, shading, appropriate building design and improvements to the building fabric. These measures should be considered alongside energy efficiency requirements so that action to improve one aspect of a property does not unintentionally increase overheating risk.

GHR5 Flood risk and drainage

55. We do not think this policy is sound as drafted. Flood risk and drainage are major concerns for development in London. Members have raised questions about whether existing sewer and drainage infrastructure can cope with planned growth. The Plan should ensure that development does not proceed ahead of the infrastructure needed to manage flood and drainage risks.

GHR6 Trees, biodiversity and geodiversity

56. We think this policy is sound as drafted. We support protecting and enhancing London's trees, biodiversity and natural environment.

GHR7 London's green infrastructure

57. We think this policy is sound as drafted. We recognise that green infrastructure is important to quality of life, health and resilience and should form part of well-designed neighbourhoods.

GHR8 Air quality

58. We think this policy is sound as drafted. We support the Mayor of London's aims to improve air quality and recognise that Improving air quality is important for London's residents and should be considered alongside transport, development and public realm decisions.

GHR9 Water resources

59. We think this policy is sound as drafted. We support responsible use of water resources and planning that recognises the pressures created by London's growing population.

GHR10 Sustainable drainage and water management

60. We think this policy is sound as drafted. We support sustainable drainage and better water management. These issues should be considered at the earliest stages of development, particularly in areas already affected by drainage problems.

GHR11 Environmental requirements and development viability

61. We think that this policy is not sound as currently drafted. We understand that environmental requirements are important, but they need to be considered alongside development viability. Our membership of professional agents are already concerned about the combined effect of planning requirements, construction costs, finance costs and other obligations. If environmental requirements are added without proper consideration of the overall cost of development, fewer schemes may be delivered. The Plan should therefore provide a clear and proportionate approach which allows environmental objectives to be achieved without undermining housing and development delivery.

Chapter 6: Place visions and place-based approaches

PV1 Brownfield First Opportunity Areas

62. We do not think this policy is sound as currently drafted. We support the use of brownfield land and the regeneration of Opportunity Areas. However, the policy should not assume that all brownfield land is immediately deliverable. Members are concerned about the cost and complexity of bringing difficult sites forward, including sites requiring major infrastructure, remediation or changes of use. We think the Plan should focus on actual delivery and provide flexibility where viability or infrastructure prevents the proposed level of development.

PV2 Central Activities Zone

63. We think this policy is sound as drafted. The Central Activities Zone is fundamental to London's economy. We support its continued protection and growth, provided that planning remains flexible enough to respond to changes in how businesses and people use central London.

PV3 Town centres and high streets

64. We do not think this policy is currently sound as drafted. London's town centres and high streets are changing quickly. Some areas continue to perform strongly, while others have significant vacancy and changing patterns of demand. Planning policy should allow greater flexibility where commercial premises are no longer viable. This could include appropriate residential or alternative uses where there is clear local need and where the change would support the wider town centre. We have previously supported reviewing town centre and high street boundaries where vacancy is high and existing uses are no longer sustainable.

PV4 Strategic economic clusters and corridors

65. We think this policy is sound. We support identifying and supporting strategic economic clusters and corridors where there is clear potential for employment and investment.

PV5 Industrial land supporting housing growth

66. We do not think this policy is sound as currently drafted. We support the need for industrial land, but the policy needs to recognise the competing pressures for housing and employment land. Where industrial sites are poorly located, underused or no longer commercially viable, there should be a proper assessment of whether redevelopment for housing or mixed use could provide a better long-term outcome.

PV6 Metropolitan Open Land

67. We think this policy is sound. We support the protection of Metropolitan Open Land and the important role it plays in London's environment and quality of life.

PV7 Sustainable development and enhancement of the Green Belt

68. We do not think this policy is sound as currently drafted. We support protecting London's Green Belt and recognise its importance for open space, biodiversity, recreation and preventing inappropriate urban sprawl. However, the policy should take a more balanced approach and recognise that not all Green Belt land performs the same function or has the same environmental or amenity value.
69. In particular, the Plan should recognise the potential of land which may be considered grey belt or declassified Green Belt, where it no longer makes a strong contribution to the purposes of the Green Belt and could provide an opportunity for sustainable development. Such sites should be assessed on their individual merits, taking account of accessibility, infrastructure, environmental value, landscape character and the potential contribution to housing delivery. This could provide additional opportunities to meet London's housing needs without treating

all Green Belt land in the same way. We are not advocating the wholesale release of Green Belt land but think a more flexible approach is needed where development can be properly planned, supported by infrastructure and deliver wider benefits, including housing delivery and the creation of high quality places.

PV8 Strategic and local views

70. We think this policy is sound. We support protecting important views and London's character, while ensuring that the policy does not unnecessarily prevent good quality development in appropriate locations.

Overall comments

71. We support the ambition of the Draft London Plan and agree that London needs more homes, better infrastructure, economic growth and greener, healthier places. We recognise the scale of the housing challenge facing London and the need for a long-term planning framework that can support sustainable growth while creating places where people want to live and work.
72. However, the Plan needs to be more realistic about delivery. The central issue is not simply how many homes can theoretically be accommodated. It is whether those homes can be financed, planned, built and occupied, and whether the infrastructure needed to support them will be available at the right time. The Plan should therefore place greater emphasis on deliverability, viability, infrastructure capacity and market conditions, rather than relying primarily on theoretical housing capacity and targets.
73. The PRS also needs a stronger place in the Plan. London cannot rely on new development alone to meet housing demand, particularly at a time when some landlords are reconsidering their position in the market. Retaining existing rented homes, bringing empty properties back into use and making better use of existing buildings are all important parts of maintaining London's housing supply. The Plan should recognise the contribution of responsible landlords and consider how planning and housing policies can work together to support a stable and well-managed PRS.
74. We also want to see a planning system that supports a wider range of developers. Smaller sites and smaller developers can make an important contribution to housing delivery and can often provide opportunities to create more varied and locally responsive developments. However, they can be disproportionately affected by delays, uncertainty, planning costs and cumulative policy requirements. A more proportionate and flexible approach would help bring forward a wider range of sites and reduce reliance on a relatively small number of larger developments.
75. Finally, housing quality must remain important alongside housing numbers. London needs homes that people can afford, but it also needs homes that are attractive, accessible, well designed and capable of meeting people's needs over the long term. Development should create places with character and good access to transport, services and infrastructure, rather than focusing solely on maximising the number of units that can be delivered.

76. We therefore support the overall direction of the Draft London Plan but recommend changes to the policies identified above so that the Plan is more flexible, viable and deliverable in practice. We would welcome the opportunity to meet with the Mayor of London and his officials to discuss these issues further and to provide practical insight from Propertymark's professional members. Our members work directly with buyers, sellers, landlords, tenants, developers and property managers across London and can provide valuable evidence on how the Plan's policies are likely to operate in practice, including the practical barriers affecting housing supply, development viability and the private rented sector. We would be pleased to continue engaging with the Mayor of London, the Greater London Authority and relevant officials as the Plan progresses and to contribute constructively to the development of a London Plan that supports housing delivery, economic growth and high quality places while recognising the realities of London's property market.