MAYOR OF LONDON

THE LONDON PLAN

THE SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON

MARCH 2021

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Contributors Credits

Jules Pipe CBE Deputy Mayor for Planning, Regeneration and Skills

Souraya Ali, David Halliwell and Tom Layfield, Senior Advisers to the Deputy Mayor

GLA Planning

Alan Smithies, Alex Green, Andrew Russell, Anna Turner, Brianne Stolper, Celeste Giusti, Darren Richards, Ei-Lyn Chia, Elliot Kemp, Gerard Burgess, Gill Lawton, Giorgio Wetzl, Graham Clements, Hassan Ahmed, Holly Lang, Holly Weir, Ijahrie Dixon, James Keogh, Jennifer Peters, John Lett, John Wacher, Jonathan Brooker, Jonathan Gibb, Jörn Peters, Julia Thomson, Juliemma McLoughlin, Kevin Reid, Lara Goldstein, Lisa Fairmaner, Lucinda Turner, Lyndon Fothergill, Mikyla Smith, Natalie Gordon, Natalie Wells, Peter Heath, Philip Waters, Rachael Rooney, Rachel Smalley, Rhian Williams, Richard Linton, Rob McNicol, Rohan Ranaweera, Sarah Blakemore, Shelly Gould, Steven Harris, Thérèse Finn, Toyin Omodara, Yiran Wei, YiTin Chiang.

GLA Group

Abby Crisostomo, Andrew Jones, Anne-Marie Robinson, Alex Marsh, Ben Corr, Bhavna Kerai, Chris Grainger, Daniel Bicknell, Debra Levison, Doug Simpson, Ellen Storrar, Gareth Fairweather, George Warren, Jack Maizels, James Clark, James Gleeson, Joanna Carless, Josephine Vos, Julian Ware, Katherine Drayson, Katie Hunter, Lucy Paterson, Madalina Ursu, Marta Lapsley, Matthew Thomas, Melisa Wickham, Oscar Watkins, Paul Broadhurst, Peter Massini, Peter North, Rachael Roe, Richard Tribe, Sam Davenport, Sara Kelly, Simon Wyke, Shamal Ratnayaka, Stephen Inch, Wil Tonkiss.

Cover and chapter page illustrations by Paul Dennis, Abbie Holloway and Scott Smith at 400.co.uk, and Jan Kallwejt represented by handsomefrank.com.

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Foreword

I am proud to publish this new and ambitious London Plan. Many Londoners won't know about or have come across the London Plan, but it affects our lives on a daily basis. It is one of the most crucial documents for our city, and what it contains shapes how London evolves and develops over coming years. Since I was elected Mayor in May 2016, publishing a new and revised London Plan, one that reflects the policies and issues on which I was elected by the people of this great city, has been a major priority for my administration.

After a rigorous process of consultation and an Examination in Public, in which 300 different organisations or individuals participated, I am really pleased to have reached this milestone. In response to the consultation on the draft London Plan, the many statements submitted to the Examination in Public, and the examination hearings themselves, we made more than 1,500 changes. This goes to show that this London Plan has genuinely been informed and influenced by the generous and thoughtful engagement of everyone involved.

This new London Plan marks a break with previous London Plans, represents a step-change in our approach and serves as a blueprint for the future development and sustainable, inclusive growth of our city.

Over many decades, London has evolved, resulting in an extraordinary web of distinctive residential streets, squares, markets, parks, offices, and industrial and creative spaces. The built environment we see today – the legacy of previous generations – has not just shaped the way our city looks but has had a profound impact on how and where we live, work, study and socialise with one another.

Throughout this evolution, London has seen waves of growth and our surroundings reflect these past chapters of rapid development and change. We now face another wave of growth, the likes of which we've not seen for a century. Our population is projected to increase by 70,000 every year, reaching 10.8 million in 2041. This means that just to meet demand, we need to build tens of thousands of new homes – along with space for new jobs – every single year.

Dealing with such a level of growth is undoubtedly one of the biggest challenges of our times, putting pressure on land, housing, infrastructure and the environment. It also comes as we are facing other unprecedented challenges: Brexit and the continued uncertainty this is causing; air pollution; climate change; and entrenched inequality. Yet despite these challenges, I am optimistic that we can embrace London's population rise as a once in a lifetime opportunity to write the next big chapter in London's history and to deliver a new vision for our city.

This London Plan sets out a new way of doing things, something I call Good Growth. Good Growth is about working to re-balance development in London towards more genuinely affordable homes for working Londoners to buy and rent. And it's about delivering a more socially integrated and sustainable city, where people have more of a say, and growth brings the best out of existing places while providing new opportunities to communities.

Good Growth is not about supporting growth at any cost, which for too long has been the priority, leaving many Londoners feeling excluded and contributing to a lack of community cohesion and social integration.

Some of the very richest and very poorest people in the country live in London, with healthy life expectancy differing by up to 19 years between boroughs. The economic prosperity and wealth, often right on some people's doorsteps, seems more remote and inaccessible to them than ever before. For too many Londoners, the thought of buying somewhere to call home is out of reach.

Instead, what we need is growth that allows us to build thousands of genuinely affordable homes at the same time as creating a more inclusive, greener and safer city that supports the health and wellbeing of all Londoners.

There are no quick fixes to the housing crisis London faces. I've always been honest with Londoners that it's a marathon, not a sprint. But we are making progress, and this plan underscores my determination to continue to address this huge problem.

Central to the plan is how we can help boroughs better co-ordinate growth across London. It includes strong new measures and sets ambitious targets for every London borough for building more of the housing we need. This goes alongside my strategic target for half of new homes to be genuinely affordable.

Unlike previous versions of the London Plan, which have often read as sweeping statements of ambition rather than concrete plans for action, this document places a specific focus on tangible policies and planning issues and provides greater clarity over how the plan will be implemented and where in London major development and infrastructure should be delivered.

Crucially, the plan also details how City Hall's housing, social, economic, cultural, environmental and transport policies tie together to achieve maximum impact. This integration across different policy areas is key to creating the conditions for sustainable growth.

Through this London Plan, we want to continue building a city that works for all Londoners – where everyone has the opportunity to reach their potential, lead fulfilling lives and build tight bonds with people from many different backgrounds within their communities.

My vision has always been for a city with an economy that supports more and better paid jobs – spread across the capital. A city where people can spend less time commuting because we have so many thriving parts of London, with good affordable housing, combined with exciting, cutting-edge career opportunities. And a city where access to great culture is built into the fabric of every part of London, with our rich heritage and cultural offer supporting our growing world-class creative industries.

The London Plan is part of realising that vision, and of revolutionising the way we get around our city – enabling a boom in active travel, with walking and cycling becoming the primary, default choice for millions of Londoners because we have made it far easier and safer. It's also about making London a greener city, with high quality open spaces, parks and commons, and one where we lead the way in tackling climate change by moving towards a zero-carbon city by 2050.

And it's about making London a city with clean air for our children to breathe, and a pioneering smart city with world-class digital connectivity supporting more digital devices to improve the lives of Londoners and enable businesses to thrive.

Over the course of my Mayoralty, we've been working hard to make this vision a reality. This includes introducing the world's-first Ultra Low Emission Zone to help clean up our air; securing London's status as the first National Park City; publishing the Good Work

Standard to make London the best city in the world in which to work; setting up London's first six Creative Enterprise Zones; and starting to build more new council homes last year than in any year since 1984. Publishing this London Plan, following its Examination in Public, is the next critical step on this journey.

This London Plan is fundamentally about taking a holistic approach and utilising all the levers we have in London to shape our city for the better, built around the needs, health and wellbeing of all Londoners. It combines a purpose and a vision. But we need everyone to do their bit, including boroughs, developers, land owners, existing residents, architects and, of course, the Government.

The level of growth we must plan for will require significant investment – both from businesses and the public sector – in transport, infrastructure and affordable housing. And in order to deliver the fundamental change we need in the long term, the Government should step up and give more powers and investment to London.

There is no question we face some huge challenges ahead. But this London Plan is an opportunity we must grasp to shape the future of our city for generations to come – not only in regard to the way it looks and feels, but in its character and how Londoners live prosperous and fulfilling lives.

Sadiq Khan

Mayor of London

Introducing the Plan

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Introducing the Plan

0.0.1 This section explains what the London Plan is, how to use the document and what process the draft Plan went through up to formal publication.

What is the London Plan?

0.0.2 Under the legislation establishing the Greater London Authority (GLA), the Mayor is required to publish a Spatial Development Strategy (SDS) and keep it under review. The SDS is known as the London Plan. As the overall strategic plan for London, it sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

0.0.3 The general objectives for the London Plan, and the process for drawing it up, altering it and replacing it, are set out in the Greater London Authority Act 1999 (as amended) and the Town and Country Planning (London Spatial Development Strategy) Regulations 2000. The London Plan has been developed in line with these requirements.

0.0.4 The legislation stipulates that the London Plan should only deal with things of strategic importance to Greater London[1] taking account of the principal purposes of the Greater London Authority which are:[2]

- promoting economic development and wealth creation in Greater London
- promoting social development in Greater London and
- promoting the improvement of the environment in Greater London.

0.0.5 In developing the SDS, in accordance with the legislation[3] and associated regulations, the Mayor has had regard to:

- the principle that there should be equality of opportunity for all people
- reducing health inequality and promoting Londoners' health
- achieving sustainable development in the United Kingdom
- climate change and the consequences of climate change
- the desirability of promoting and encouraging the use of the Thames, particularly for passenger and freight transportation
- the resources available to implement the Mayor's strategies.

1 GLA Act 1999, section 334(5)

2 GLA Act 1999, section 30

3 GLA Act 1999, Section 41

0.0.6 In drawing up the new London Plan, the Mayor has also had regard to:

- all relevant European Union obligations of the UK
- the need to ensure consistency with national policies and international treaty obligations notified to the Mayor by Government, without seeking to repeat national policy
- the Mayor's other statutory obligations including the duty for the GLA to do all it reasonably can to prevent crime and disorder under the Crime and Disorder Act 1998, and the public-sector equality duty, as set out in Section 149 of the Equality Act 2010, covering race, disability, sex, age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment.

0.0.7 The document brings together the geographical and locational aspects of the Mayor's other strategies, to ensure consistency with those strategies, including those dealing with:

- transport
- environment
- economic development
- housing
- culture
- health and health inequalities.

0.0.8 The London Plan is legally part of each of London's Local Planning Authorities' Development Plan and must be taken into account when planning decisions are taken in any part of Greater London. Planning applications should be determined in accordance with it, unless there are sound planning reasons (other material considerations) which indicate otherwise. All Development Plan Documents and Neighbourhood Plans have to be 'in general conformity' with the London Plan.

How to use the document

0.0.9 Planning in London is the joint responsibility of the Mayor of London and the 32 London boroughs, the City of London Corporation and the Mayoral Development Corporations (MDCs) (of which there are currently two: the London Legacy Development Corporation and the Old Oak Park Royal Development Corporation) along with neighbourhood forums designated by London's local planning authorities. When the London Plan refers to 'boroughs' it is referring to the 32 London boroughs, the City of London and the MDCs. This approach has been taken to make the document more readable.

0.0.10 The London Plan is an integrated policy framework and must be read as a whole. The placement of the topic chapters and the policies within the chapters is no reflection on their importance or weight – it does not represent a hierarchy.

0.0.11 The London Plan sets out policies and supporting text (also known as reasoned justification). These take account of:

- the legal requirements related to the development of the London Plan
- other requirements of Government planning policy and guidance (without seeking to repeat these)
- the integrated impact and habitats regulations assessment
- the evidence that underpins the Plan (without seeking to repeat it).

0.0.12 The published London Plan takes account of the comments received during the consultation process and the recommendations of the panel that conducted the Examination in Public.

0.0.13 This London Plan runs from 2019 to 2041. This date has been chosen to provide a longer-term view of London's development to inform decision making. However, some of the more detailed elements of the Plan, such as the annual housing targets, are set for only the first ten years of the Plan. This reflects the capacity of land suitable for residential development and intensification identified in the 2017 Strategic Housing Land Availability Assessment (SHLAA) which, due to the dynamic nature of London's land market, does not attempt to robustly identify capacity beyond 2029.

0.0.14 This London Plan relies on the 2017 Strategic Housing Market Assessment (SHMA) for its evidence of housing needs. The 2017 SHMA uses an established methodology that takes full account of the diversity of London's housing needs and has been found sound at Examination.

0.0.15 To help the reader navigate through the London Plan, paragraphs include key words in bold. The bold font does not signify extra weight or suggest that the paragraph is the only place that the specific issue is discussed.

0.0.16 A glossary has also been included to provide a definition of words or phrases where necessary.

A new Plan

0.0.17 This is a new London Plan (also known as a Replacement Plan). This means it is not an alteration or update to previous London Plans. This new London Plan is the third London Plan, the previous ones being the 2004 London Plan produced by former Mayor of London Ken Livingstone, and the 2011 London Plan produced by former Mayor of London Boris Johnson. All of the other iterations

of the London Plan from 2004-2016 have been alterations. This London Plan replaces all previous versions.

0.0.18 This London Plan is different to those that have gone before it. It is more ambitious and focused than any previous London Plans. The concept of Good Growth – growth that is socially and economically inclusive and environmentally sustainable – underpins the London Plan and ensures that it is focused on sustainable development.

0.0.19 As well as taking account of the relevant legislation, and Government policy, this London Plan also seeks to deliver the Mayor's manifesto commitments and – alongside the Mayor's other strategies – set the framework for how these commitments can be achieved in spatial development terms.

0.0.20 The policies in the London Plan are supported by a proportionate evidence base.[4] The Plan seeks to develop an approach tailored for London to reflect the particular circumstances in the capital, and will act as the key document shaping planning decisions across Greater London.

0.0.21 The Plan provides an appropriate spatial strategy that plans for London's growth in a sustainable way. The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their Local Plan development unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan.

0.0.22 The Plan does not meet all of London's identified development needs. Work will need to be undertaken to explore the potential options for meeting this need sustainably in London and beyond. This is a matter for a future Plan, and requires close collaboration with local and strategic authorities and partners. Clear commitment from the Government is essential to support the consideration of these options and the significant strategic infrastructure investment requirements associated with them.

0.0.23 The London Plan is part of the Development Plan. The policies have been drafted in a way that allows London to implement this ambitious London Plan as soon as possible. There is no requirement for the policies to be repeated at the local level. However, in some instances a local approach is required within the context of the overall policy. The London Plan clearly sets out where this is the case.

4 https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan/eip-library

0.0.24 The London Plan does not preclude boroughs and neighbourhood forums from bringing forward policies in their Development Plan Documents or Neighbourhood Plans that vary from the detail of the policies in this Plan where locally-specific circumstances and evidence suggests this would better achieve the objectives of the London Plan and where such an approach can be considered to be in general conformity with the London Plan.

0.0.25 The Plan provides the framework to address the key planning issues facing London, allowing boroughs to spend time and resources on those issues that have a distinctly local dimension and on measures that will help deliver the growth London needs. This includes: area-based frameworks, action plans and Supplementary Planning Documents, site allocations, brownfield registers and design codes, as well as supporting neighbourhood planning.

0.0.26 It is crucial that all those involved in planning and development in London understand how London's three-tier planning system works (including regional, local and neighbourhood planning) and do not seek to duplicate policy or evidence unnecessarily.

0.0.27 The Mayor is legally required to keep the London Plan under review.[5] The Key Performance Indicators (KPIs) and approach to monitoring set out in the final chapter of the Plan provide a basis for this ongoing review, allowing an assessment of the effectiveness of the Plan to be made over time. Alongside this, key assumptions which underpin the Plan will also be monitored, in particular population and household growth and employment growth. Significant demographic or employment changes which are likely to persist would trigger a partial or full review of the Plan, as would significant persistent divergence from the performance measures of the KPIs.

Integrated Impact Assessment

0.0.28 A key part of reviewing the London Plan is undertaking a full Integrated Impact Assessment (IIA) and Habitats Regulations Assessment (HRA). The IIA approach addresses the Mayor's legal duties to carry out a comprehensive assessment of the Plan and its proposed policies with one integrated process. The IIA incorporates the statutory requirements of:

- Strategic Environmental Assessment
- Sustainability Appraisal
- Equalities Impact Assessment

5 GLA Act 1999, section 339(1)

- Health Impact Assessment
- Community Safety Impact Assessment

0.0.29 The HRA assesses any aspects of the Plan that would cause a likely significant effect on any European Habitats Sites. The IIA and HRA have helped shape the preparation of the London Plan ensuring that these key issues have been taken into account throughout the development process.

Structure of the Plan

0.0.30 Chapter one, together with the Foreword, sets out the Mayor's vision and explains what Good Growth is. Chapter one contains six core 'good growth' objectives which should be taken into account for all planning and development in London. Each sets out a high-level objective, which is a more detailed expression of the Mayor's vision, with clauses underneath setting out the strategic approach to development in London. The subsequent chapters provide the topic-specific and spatially-specific policies that are required to deliver the Good Growth objectives.

0.0.31 Chapter two sets out the overall spatial development pattern for London, focusing on the growth strategies for specific places in London and how they connect with the Wider South East.

0.0.32 Chapters three to twelve cover topic-based policies and implementation:

- Chapter 3 Design
- Chapter 4 Housing
- Chapter 5 Social Infrastructure
- Chapter 6 Economy
- Chapter 7 Heritage and Culture
- Chapter 8 Green Infrastructure and Natural Environment
- Chapter 9 Sustainable Infrastructure
- Chapter 10 Transport
- Chapter 11 Funding the London Plan
- Chapter 12 Monitoring

How the London Plan has been produced

0.0.33 In October 2016, the Mayor published 'A City for All Londoners'. This document set the tone for all of the Mayor's strategies and the direction of travel for the Mayoralty. It discussed the high-level responses to the big challenges that London faces: the pressure that a fast-growing population exerts on the city; the increasing diversity of Londoners; rising inequality; the changing nature of the economy; the uncertainty caused by the EU referendum result; and the effects of climate change.

0.0.34 The document was put out to consultation and the feedback from it helped shape all the Mayoral strategies. In addition, to inform the development of the London Plan, a number of workshops were held which provided an opportunity for a range of stakeholders to come together and discuss the challenges and opportunities the city faces.

0.0.35 In December 2017 the Mayor launched the draft new London Plan. Three months of consultation were carried out, with Mayoral representatives appearing at over 100 separate consultation events and receiving thousands of consultation responses. These responses informed the Minor Suggested Changes published in August 2018. This version of the Plan, along with the consultation responses, was submitted for public examination.

0.0.36 The Secretary of State for Housing, Communities and Local Government appointed a panel of three Planning Inspectors who conducted the Examination in Public (EiP) of the London Plan. The EiP was held in the Chamber at City Hall between 15 January 2019 and 22 May 2019, and involved over 300 organisations and individuals contributing to the discussion of 94 matters in 51 hearing sessions. In response to statements submitted by participants and to the discussions at the hearing sessions, a number of Further Suggested Changes to the Plan were suggested and a consolidated version, including all these suggested changes, was sent to the Inspectors in July 2019.

0.0.37 The Panel published its report in October 2019. The report concluded that the Plan provides an appropriate basis for the strategic planning of Greater London, subject to the recommendations set out. The Mayor considered these recommendations and modified the Plan accordingly. The Mayor did not accepted all the Panel's recommendations and produced a statement giving reasons for why some recommendations were not accepted. This statement and a copy of the Plan were submitted to the Secretary of State in December 2019, and was laid before the London Assembly on 6 February 2020.

0.0.38 The Secretary of State issued formal directions to the Mayor to modify the Plan on 13 March 2020 and 10 December 2020. The Mayor made modifications to

the Plan, taking account of the directions, and sent this version to the Secretary of State on 21 December 2020. The Secretary of State wrote to the Mayor on 29 January 2021 to confirm that this version contains the modifications necessary to conform with the directions. The London Plan was published on 2 March 2021.

Chapter 1

Planning London's Future - Good Growth

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1.0.1 Good Growth - growth that is socially and economically inclusive and environmentally sustainable – underpins the whole of the London Plan and each policy. It is the way in which sustainable development in London is to be achieved.

1.0.2 London's growth and development is shaped by the decisions that are made every day by planners, planning applicants, decision-makers and Londoners across the city. Every individual decision to provide affordable housing helps to make the housing market fairer. Every decision to make a new development car-free helps Londoners to depend less on cars and to live healthier lives. Every decision to build or expand a school improves the prospects of the next generation of Londoners.

1.0.3 Each week, hundreds of these individual decisions contribute to progress across London, shaping places and improving lives. Over the course of years, they can transform the whole city for the benefit of Londoners now and in the future.

1.0.4 The London Plan provides the strategic framework within which all these decisions are made. It guides boroughs' Development Plans to ensure that they are working towards a shared vision for London, and it establishes policies that allow everyone involved in new developments to know what is expected from them.

1.0.5 By setting a new level of ambition for the people who make all of London's planning decisions, this London Plan will help realise the Mayor's vision of creating a city for all Londoners, where no one is left behind.

Planning for Good Growth

1.0.6 The London Plan covers the full range of planning issues, from the number of homes London needs to the design of its streets, and it is important that each policy is clear and implementable. But the Plan is not only a set of individual policies – taken together, these policies provide a vision for how London should sustainably grow and develop in the future.

1.0.7 London's global economy is the envy of other world cities and with good reason – it is the engine of the national economy and will sustain the level of population growth expected in London over the coming years. But to plan a city that works for all Londoners, as the population grows towards 10.8 million by 2041, it will be important to think about what the purpose of economic growth actually is.

1.0.8 A failure to consider this fundamental question has led to some of the most serious challenges London faces today. The growth in population and jobs has not been matched by the growth in the number and type of homes London needs, driving up rents and house prices to levels that have priced many

Londoners out of the market. A focus on large multinational businesses in the centre of London has not been matched by economic development in other parts of the city. A failure to consider the wider implications of London's growth has increased car dependency, leading to low levels of physical activity, significant congestion, poor air quality and other environmental problems.

1.0.9 This London Plan takes a new approach. It plans for growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit. It uses the opportunities of a rapidly-growing city to plan for a better future, using each planning decision to improve London, transforming the city over time. It plans not just for growth, but for Good Growth – sustainable growth that works for everyone using London's strengths to overcome its weaknesses.

1.0.10 A city that is planned well can improve as it grows. Planning for the right number of homes and higher levels of affordable housing will take advantage of London's growth to re-balance the housing market. Planning for mixed-use developments in all parts of London will spread the success of London's economy and create stronger communities where everyone feels welcome. Planning new developments to reduce car dependency will improve Londoners' health and make the city a better place to live. Planning for a 'smarter' city, with world-class digital connectivity will enable secure data to be better used to improve the lives of Londoners.

1.0.11 To ensure that London's growth is Good Growth, each of the policy areas in this Plan is informed by six Good Growth objectives:

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience

1.0.12 Planners, planning applicants and decision-makers should consider how their actions are helping to deliver these objectives as they work to develop and improve London. By doing so, they will keep London's development on track, ensuring that the growth of the city benefits all Londoners.

Building strong and inclusive communities

1.1.1 London is made up of diverse communities. Its neighbourhoods, schools, workplaces, parks, community centres and all the other times and places Londoners come together give the city its cultural character and create its future. Planning for Good Growth means planning with these communities – both existing and new – making new connections and eroding inequalities.

1.1.2 London is one of the most diverse cities in the world, a place where everyone is welcome. 40 per cent of Londoners were born outside of the UK, and over 300 languages are spoken here. 40 per cent of Londoners are from Black, Asian and Minority Ethnic (BAME) backgrounds, and the city is home to a million EU citizens, 1.2 million disabled people, and up to 900,000 people who identify as LGBT+. Over a fifth of London's population is under 16, but over the coming decades the number of Londoners aged 65 or over is projected to increase by 90 per cent. This diversity is essential to the success of London's communities. To maintain this London must remain open, inclusive and allow everyone to share in and contribute towards the city's success.

1.1.3 London is one of the richest cities in the world, but it is also home to some of the poorest communities in the country, with wealth unevenly distributed across the population and through different parts of the city. It is home to an ageing population, with more and more people facing the barriers that already prevent many from participating fully in their communities. Traffic dominates too many streets across the city, dividing communities and limiting the interactions that take place in neighbourhoods and town centres.

1.1.4 Delivering good quality, affordable homes, better public transport connectivity, accessible and welcoming public space, a range of workspaces in accessible locations, built forms that work with local heritage and identity, and social, physical and environmental infrastructure that meets London's diverse needs is essential if London is to maintain and develop strong and inclusive communities.

1.1.5 Early engagement with local people leads to better planning proposals, with Neighbourhood Plans providing a particularly good opportunity for communities to shape growth in their areas. Taking advantage of the knowledge and experience of local people will help to shape London's growth, creating a thriving city that works better for all Londoners.

GG1 Building strong and inclusive communities

Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:

A encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies

B seek to ensure changes to the physical environment to achieve an overall positive contribution to London

C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation

D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city

E ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy-in, and where communities can develop and thrive

F promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for building relationships during the daytime, evening and night time

G ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements

H support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation

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I support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Making the best use of land

1.2.1 London's population is set to grow from 8.9 million today to around 10.8 million by 2041. As it does so, employment is expected to increase on average by 49,000 jobs each year, reaching 6.9 million over the same period. This rapid growth will bring many opportunities, but it will also lead to increasing and competing pressures on the use of space. To accommodate growth while protecting the Green Belt, and for this growth to happen in a way that improves the lives of existing and new Londoners, this Plan proposes more efficient uses of the city's land.

1.2.2 The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities.

1.2.3 The benefits of this approach are wide-ranging, going well beyond the simple ability to provide more homes and jobs. High-density, mixed-use places support the clustering effect of businesses known as 'agglomeration', maximising job opportunities. They provide a critical mass of people to support the investment required to build the schools, health services, public transport and other infrastructure that neighbourhoods need to work. They are places where local amenities are within walking and cycling distance, and public transport options are available for longer trips, supporting good health, allowing strong communities to develop, and boosting the success of local businesses.

1.2.4 Making the best use of land means directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking and cycling networks. Integrating land use and transport in this way is essential not only to achieving the Mayor's target for 80 per cent of all journeys to be made by walking, cycling and public

transport, but also to creating vibrant and active places and ensuring a compact and well-functioning city.

1.2.5 All options for using the city's land more effectively will need to be explored as London's growth continues, including the redevelopment of brownfield sites and the intensification of existing places, including in outer London. New and enhanced transport links will play an important role in allowing this to happen, unlocking homes and jobs growth in new areas and ensuring that new developments are not planned around car use.

1.2.6 As London develops, the Mayor's Good Growth by Design programme – which seeks to promote and deliver a better, more inclusive form of growth on behalf of all Londoners – will ensure that homes and other developments are of high quality. Existing green space designations will remain strong to protect the environment, and improvements to green infrastructure, biodiversity and other environmental factors, delivering more than 50 per cent green cover across London, will be important to help London become a National Park City.

1.2.7 London's distinctive character and heritage is why many people want to come to the city. London's heritage holds local and strategic significance for the city and for Londoners, and will be conserved and enhanced. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, should be used positively to guide and stimulate growth, and create distinctive, attractive and cherished places.

1.2.8 Making the best use of land will allow the city to grow in a way that works for everyone. It will allow more high-quality homes and workspaces to be developed as London grows, while supporting local communities and creating new ones that can flourish in the future.

GG2 Making the best use of land

To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:

A enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites

B prioritise sites which are well-connected by existing or planned public transport

C proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling

D applying a design–led approach to determine the optimum development capacity of sites

E understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character

F protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible

G plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth

H maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.

Creating a healthy city

1.3.1 The mental and physical health of Londoners is, to a large extent, determined by the environment in which they live. Transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks can have a greater influence on health than healthcare provision or genetics. Many of these determinants of health can be shaped by the planning system, and local authorities are accordingly responsible for planning and public health.

1.3.2 As set out in the Mayor's Health Inequalities Strategy, the scale of London's health inequalities is great and the need to reduce them is urgent. Healthy life expectancy is lower in more deprived areas, and the differences between parts of London is stark – more than 15 years for men and almost 19 years for women. London's ongoing growth provides an opportunity to reduce these inequalities. Delivering Good Growth will involve prioritising health in all of London's planning decisions, including through design that supports health outcomes, and the assessment and mitigation of any potential adverse impacts of development proposals on health and health inequality.

1.3.3 The causes of London's health problems are wide-ranging. Many of London's major health problems are related to inactivity. Currently only 34 per cent of Londoners report doing the 20 minutes of active travel each day that can help them to stay healthy, but good planning can help them to build this into their daily routine. Access to green and open spaces, including waterways, can improve health, but access and quality varies widely across the city. Excessive housing costs or living in a home that is damp, too hot or too cold can have serious health impacts. A healthy food environment and access to healthy food is vital for good health. Good planning can help address all these issues.

1.3.4 The Healthy Streets Approach outlined in this plan puts improving health and reducing health inequalities at the heart of planning London's public space. It will tackle London's inactivity crisis, improve air quality and reduce the other health impacts of living in a car-dominated city by planning street networks that work well for people on foot and on bikes, and providing public transport networks that are attractive alternatives to car use. It will also ensure that streets become more social spaces.

1.3.5 The social and environmental causes of ill-health are numerous and complex, and the people who are most affected by London's health inequalities tend also to be affected by other forms of inequality. Creating a healthy city with reduced health inequalities will make London fairer for everyone. The Mayor plays a pivotal role in bringing together a diverse range of stakeholders from service providers, boroughs, communities and the private sector in order to provide

a more integrated approach to promoting a healthy city and reducing health inequalities. The Mayor will co-ordinate investment and focus regeneration initiatives in those parts of London most affected by inequalities, including health inequalities.

GG3 Creating a healthy city

To improve Londoners' health and reduce health inequalities, those involved in planning and development must:

A ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities

B promote more active and healthy lives for all Londoners and enable them to make healthy choices

C use the Healthy Streets Approach to prioritise health in all planning decisions

D assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments

E plan for appropriate health and care infrastructure to address the needs of London's changing and growing population

F seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution

G plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports

H ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold

I seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.

Delivering the homes Londoners need

1.4.1 Few things are as important as a suitable home, but for many Londoners the type of home they want, and should reasonably be able to expect, is out of reach. In 2016, the gap between average house prices in London and the rest of the country reached a record high, and the private rental cost of a one-bedroom home in London is now more than the average for a three-bedroom home in any other English region. A housing market that only works for the very wealthy does not work for London.

1.4.2 The state of London's housing market has implications for the makeup and diversity of the city. Affordable housing is central to allowing Londoners of all means and backgrounds to play their part in community life. Providing a range of high quality, well-designed, accessible homes is important to delivering Good Growth, ensuring that London remains a mixed and inclusive place in which people have a choice about where to live. The failure to provide sufficient numbers of new homes to meet London's need for affordable, market and specialist housing has given rise to a range of negative social, economic and environmental consequences, including: worsening housing affordability issues, overcrowding, reduced labour market mobility, staff retention issues and longer commuting patterns.

1.4.3 The lack of supply of the homes that Londoners need has played a significant role in London's housing crisis. The 2017 London Strategic Housing Market Assessment has identified a significant overall need for housing, and for affordable housing in particular. London needs 66,000 new homes each year, for at least twenty years, and evidence suggests that 43,000 of them should be genuinely affordable if the needs of Londoners are to be met. This supports the Mayor's strategic target of 50 per cent of all new homes being genuinely affordable, which is based on viability evidence.

1.4.4 The London Plan is able to look across the city to plan for the housing needs of all Londoners, treating London as a single housing market in a way that is not possible at a local level. In partnership with boroughs, the Mayor has undertaken a Strategic Housing Land Availability Assessment to identify where the homes London needs can be delivered. Ten-year housing targets have been established for every borough, alongside Opportunity Area plans for longer-term delivery where the potential for new homes is especially high. Boroughs can rely on these targets when developing their Development Plan Documents and are not required to take account of nationally-derived local-level need figures.

1.4.5 To meet the growing need, London must seek to deliver new homes through a wide range of development options. Reusing large brownfield sites will remain crucial, although vacant plots are now scarce, and the scale and complexity

of large former industrial sites makes delivery slow. Small sites in a range of locations can be developed more quickly, and enable smaller builders to enter the market. Building more housing as part of the development of town centres will also be important, providing homes in well-connected places that will help to sustain local communities.

1.4.6 The homebuilding industry itself also needs greater diversity to reduce our reliance on a small number of large private developers. New and innovative approaches to development, including Build to Rent, community-led housing, and self- and custom-build, will all need to play a role, and more of our new homes will need to be built using precision-manufacturing. Alongside this, there will need to be a greater emphasis on the role councils and housing associations play in building genuinely affordable homes.

1.4.7 There are a range of other measures that have an impact on the availability of homes. For example, existing homes must not be left empty, and have the potential to be brought back into use as affordable housing, and boroughs should use all the tools at their disposal to ensure that homes are actually built after planning permissions are granted.

1.4.8 Delivering the housing London needs will be a huge challenge that will require everyone involved in the housing market to work together. Along with the London Housing Strategy, this London Plan establishes the framework that will make this possible, helping to make London a city that everyone who wants to can call home.

GG4 Delivering the homes Londoners need

To create a housing market that works better for all Londoners, those involved in planning and development must:

A ensure that more homes are delivered

B support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable

C create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing

D identify and allocate a range of sites to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset

E establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

Growing a good economy

1.5.1 London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the Wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning, but the benefits of economic success are not shared evenly within London itself.

1.5.2 The things that make London's economy so strong are the same things that make London an attractive and exciting place to live, work and visit. London's ethos of tolerance and respect, its rich cultural and historic assets, the quality of its streets and public places, its spirit of creativity and entrepreneurialism – these things attract businesses of all sizes and allow them to develop and thrive. The people who these businesses employ need strong communities, good public transport connections, pleasant environments that promote good health, access to shops and local services, and good quality, affordable homes in places they want to live. The continuing success of London's economy is reliant upon making the city work better for everyone.

1.5.3 Projected growth towards 6.9 million jobs by 2041 provides an opportunity to strengthen London's economy for the future, and doing so will depend on increasing diversification. The Central Activities Zone and Northern Isle of Dogs will remain vital to London's economic success, but growth in town centres across London will be equally important, alongside supporting local regeneration, investment in Opportunity Areas and enabling access to a wide range of jobs. Reasonably-priced, good quality employment space will be needed across London to make this happen.

1.5.4 The right infrastructure is also required to help businesses succeed across London. The digital economy, underpinned by world-class digital connectivity, data and digital services is of ever-increasing importance, improving processes, opening up new markets and allowing more flexible working. Convenient transport connections and street, rail and waterway networks that allow the efficient movement of goods and people are also vital, alongside the schools, healthcare facilities and other amenities that employees need to be healthy and productive.

1.5.5 Developing Londoners' skills will help people into work and enable businesses to thrive. By working closely with communities and businesses, London's world-

class higher education institutions can support growth and regeneration while addressing skills shortages.

1.5.6 Britain's exit from the European Union will put new pressures on London's economy, and the need to strengthen and diversify London's business base will become ever-more important. Doing so in a way that spreads London's success more equitably will be an important part of delivering Good Growth.

GG5 Growing a good economy

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

A promote the strength and potential of the wider city region

B seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London

C plan for sufficient employment and industrial space in the right locations to support economic development and regeneration

D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth

E ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning

F promote and support London's rich heritage and cultural assets, and its role as a 24-hour city

G make the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity

H recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.

Increasing efficiency and resilience

1.6.1 Successful cities must adapt to a changing world, and a focus on Good Growth provides an opportunity to become more efficient and resilient. A responsible city must limit its impact on climate change while adapting to the consequences of the environmental changes that human behaviour is already creating. Global cities also face other threats against which London must protect its residents and visitors, and proper strategic planning can help to make the city a safer place.

1.6.2 All cities must face up to the reality of climate change and the need to limit their future contribution to this major global problem. This London Plan will require developments to contribute towards London's ambitious target to become zero-carbon by 2050 by increasing energy efficiency, including through the use of smart technologies, and utilising low carbon energy sources. Creating a low carbon circular economy, in which the greatest possible value is extracted from resources before they become waste, is not only socially and environmentally responsible, but will save money and limit the likelihood of environmental threats affecting London's future.

1.6.3 These environmental threats are real and present, and London must be prepared for them. London's homes and infrastructure must be protected against the increasing likelihood of heatwaves, and developments must plan for a more integrated approach to water management, while minimising flood risk.

1.6.4 Equally significant in a global city is the threat of terrorism, and new forms of attack require new forms of defence. Large-scale fires also remain a possibility in London. As public places are made safer and existing housing is improved, these threats underline the importance of collaborative planning with London's police forces and public safety experts, the London Fire and Emergency Planning Authority.

1.6.5 Careful planning of strategic and local infrastructure in all its forms can make the city smarter, more efficient and more resilient, preparing it for all that the future may bring. This will require collaboration between the infrastructure industry and planning authorities to determine what is needed where in order to plan for London's future, using the framework established by the Mayor's Strategic Infrastructure Investment Plan.

1.6.6 Ensuring sufficient housing at the right price is also key to the city's resilience. The shortage of affordable housing in the capital is hindering the recruitment and retention of public service workers, including those crucial to the operation

of the emergency services, the health system and London's transport infrastructure.

1.6.7 Good planning can make London more resilient against the threats of the modern world, while improving the city's impact on the environment. The approaches set out in this Plan will ensure that London remains a safe and prosperous place to live for many decades to come.

GG6 Increasing efficiency and resilience

To help London become a more efficient and resilient city, those involved in planning and development must:

A seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050

B ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect

C create a safe and secure environment which is resilient the impact of emergencies including fire and terrorism

D take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

Chapter 2

Spatial Development Patterns

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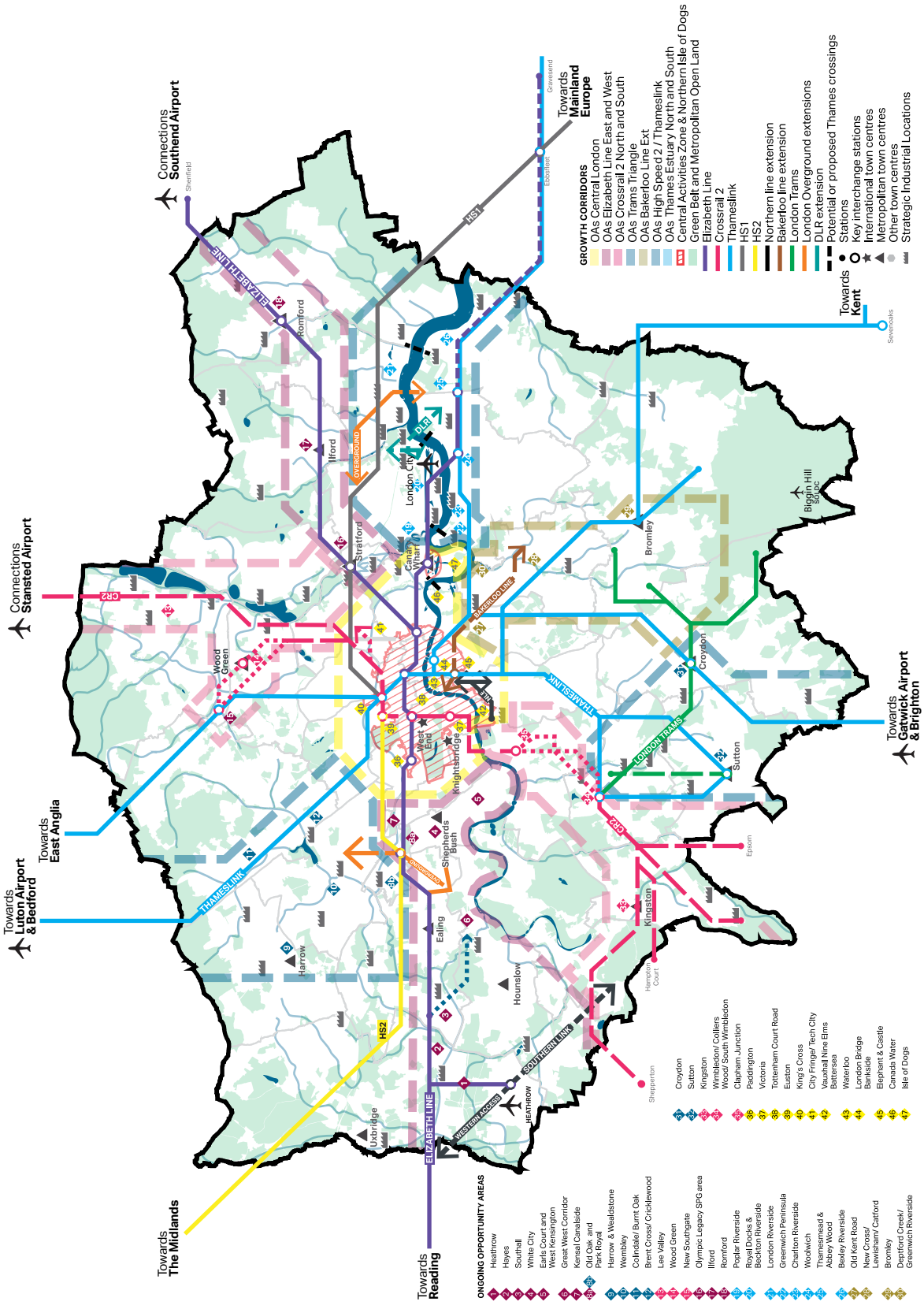
Figure 2.1 - The Key Diagram



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2.0.1 This chapter gives a strategic framework for those parts of London that will see significant development over the lifetime of the Plan, and addresses how change will be managed for London's most sensitive and complex places. The Key Diagram (Figure 2.1) presents the spatial vision set out in this chapter, covering London's growth corridors, Opportunity Areas, town centres, and Green Belt and Metropolitan Open Land.

2.0.2 London's green and open spaces are a vital part of the capital. Its parks, rivers and green open spaces are some of the places that people most cherish and they bring the benefits of the natural environment within reach of Londoners. **London's Green Belt and Metropolitan Open Land** designations (see Chapter 8) serve to protect these strategically-important open spaces, prevent urban sprawl and focus investment and development on previously developed land.

2.0.3 If London is to meet the challenges of the future, all parts of London will need to embrace and manage change. Not all change will be transformative – in many places, change will occur incrementally. This is especially the case in **outer London**, where the suburban pattern of development has significant potential for appropriate intensification over time, particularly for additional housing.

2.0.4 The areas that will see the most significant change are identified as Opportunity Areas. Many of these **Opportunity Areas** are already seeing significant development, and they all have the potential to deliver a substantial amount of the new homes and jobs that London needs. The London Plan has a clear focus on delivery – something that will require all stakeholders to work together to unlock sites and drive the right sort of development. Infrastructure is key to this delivery and will require major investment in transport, with Opportunity Areas clustered into growth corridors; and proper planning of utilities and communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

2.0.5 London's influence and economy continue beyond the M25. Many of London's growth corridors have links **beyond London's boundaries**. Collaboration with Wider South East partners outside London will help to secure mutual benefits.

2.0.6 London's **Central Activities Zone (CAZ) and town centres** are the primary locations for commercial activity in the capital. These are complex parts of London, with a wide mix of uses and unique local character. The CAZ and the town centre network have a crucial role to play in supporting London's growth, and the London Plan sets out how this growth should be managed and planned for. Many town centres and the surrounding areas have potential to accommodate significant quantities of new housing, making the most of walking,

cycling and public transport connectivity and complementing their commercial role.

2.0.7 Growth and change have not always benefited Londoners equally. In some cases, the wrong sort of growth has led to established communities finding themselves priced out of the area they call home. Some parts of the city have not benefited from the advantages the growth of London provides, with too many areas in London still experiencing deprivation despite the wider success of the capital. To address this, it is important that there is a strong focus on **sustainable and inclusive regeneration** in these areas, with boroughs, the Mayor and other partners working closely with the local community to bring about the right sort of change and investment. Where significant development is planned in these areas, it is crucial that it benefits local communities, provides employment and genuinely affordable housing, and is properly integrated into the area.

Growth Corridors and Opportunity Areas

Policy SD1 Opportunity Areas

A To ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will:

1) provide support and leadership for the collaborative preparation and implementation of planning frameworks that:
   a) set out a clear strategy for accommodating growth
   b) assist in delivering specific infrastructure requirements that unlock capacity for new homes and jobs
   c) support regeneration
   d) are prepared in an open and timely manner
   e) encourage the strategic remediation of contaminated land
2) bring together the range of investment and intervention needed to deliver the vision and ambition for the area
3) support and implement adopted planning frameworks, in order to give them appropriate material weight in planning decisions
4) ensure that his agencies (including Transport for London) work together and with others to promote and champion Opportunity Areas, and

identify those that require public investment and intervention to achieve their growth potential

5) ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities
6) ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration
7) monitor progress in delivering homes, jobs and infrastructure, taking action where necessary to overcome any barriers to delivery
8) ensure that development facilitates ambitious transport mode share targets.

B Boroughs, through Development Plans and decisions, should:

1) clearly set out how they will encourage and deliver the growth potential of Opportunity Areas
2) support development which creates employment opportunities and housing choice for Londoners
3) plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities, working with infrastructure providers where necessary
4) recognise the role of heritage in place-making
5) establish the capacity for growth in Opportunity Areas, taking account of the indicative capacity for homes and jobs in Table 2.1
6) support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution, co-location and substitution
7) include ambitious transport mode share targets
8) support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration

9) ensure planning frameworks are informed by public and stakeholder engagement and collaboration at an early stage and throughout their development

10) work with the Mayor, local communities and other stakeholders to review appropriate locations and identify new Opportunity Areas. These should be distinct and significant locations that have capacity for at least 5,000 new jobs and/or 2,500 new homes

11) take appropriate measures to deal with contamination that may exist.

2.1.1 **Opportunity Areas** are identified as significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two. When developing policies for Development Plans, allocations and frameworks, boroughs should use the indicative capacity figures as a starting point, to be tested through the assessment process.

2.1.2 Many Opportunity Areas overlap with **Strategic Areas for Regeneration**, and have the potential to promote inclusive growth that increases opportunity for all Londoners.

2.1.3 The Mayor will provide the **support and leadership** to ensure Opportunity Areas deliver their growth potential for Londoners. He will promote and champion the areas as key locations for investment, and will intervene where required so that an ambitious, imaginative and inclusive approach is taken to accelerate and realise their growth and development. This approach should include understanding the existing character and context of an area, in accordance with Policy D1 London's form, character and capacity for growth.

2.1.4 **Opportunity Area Planning Frameworks** (OAPFs) can represent the first stage in a plan-led approach to providing significant quantities of additional jobs and homes, improvements to transport and other infrastructure, and better access to local services. The Mayor recognises that there are different models for taking these forward depending on the circumstances and development needs of each Opportunity Area, and for translating these frameworks into policy in Development Plan Documents and Supplementary Planning Documents. Whatever model is used, frameworks must be prepared in a collaborative way with local communities and stakeholders.

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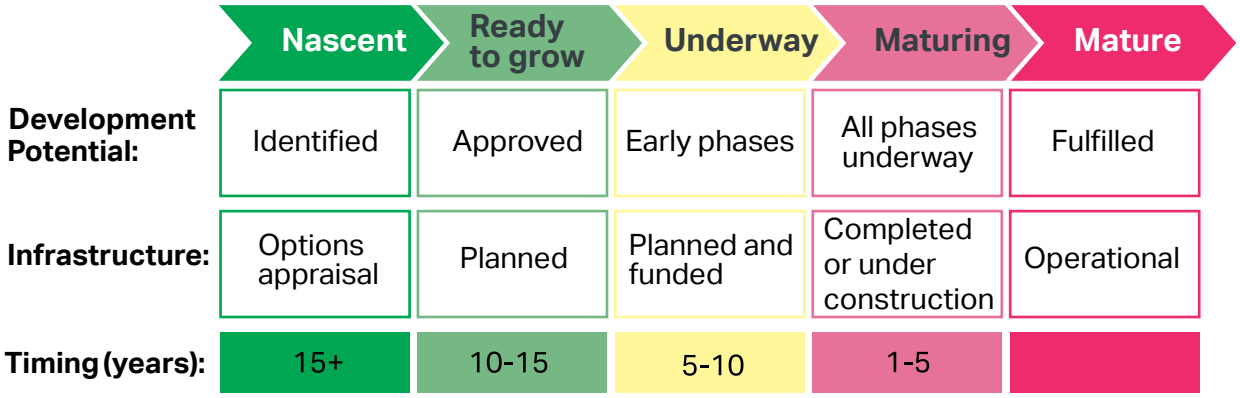
Figure 2.2 - OAPF process diagram



2.1.5 The timescales in this diagram are indicative and based on the information available at the time it was compiled. While it may take some of the 'nascent' or 'ready to grow' Opportunity Areas 10-15 years to fully mature, there will be potential for new homes and jobs to be delivered in earlier phases. This will vary by area according to the scale and complexity of infrastructure and delivery issues. The categories will be kept under review as frameworks are produced and/or transport and other infrastructure delivered.

2.1.6 A crucial part of London's future success will be **improving access within and into the capital**. The major transport infrastructure that facilitates this acts as a vital catalyst, unlocking new areas for development, enabling the delivery of additional homes and jobs, facilitating higher densities, using the Healthy Streets Approach to create vibrant neighbourhoods that are appealing places to walk, cycle and spend time, and providing local people with access to the facilities and services that they need.

2.1.7 Through the Mayor's Transport Strategy, the London Plan and other strategies, the Mayor has identified Opportunity Areas (OAs) set out in Figure 2.4 to Figure 2.12. The **growth corridors** described below demonstrate the linkages between the OAs highlighting that they should not be planned in isolation. In order to meet London's needs and ensure sustainable development, all stakeholders should seek to proactively promote and enable growth in these areas in line with the policies in this Plan. The Mayor will, and boroughs and other stakeholders should, develop effective cross-boundary working arrangements in order to unlock the full potential of the growth corridors within London.

2.1.8 In order to make the best use of land, enable the development of brownfield sites, and contribute to creating a healthy city it is important that development proposals appropriately deal with **contamination** so land can be safely used.

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Strategic opportunities should be explored for addressing land contamination, particularly where there are cross boundary issues. A joined-up approach to remediation can enable the costs and benefits of this to be shared. The development of Opportunity Area Planning Frameworks will be a key means of achieving this.

2.1.9 The key growth corridors within London are set out below. Policy SD2 Collaboration in the Wider South East and Figure 2.15 include Strategic Infrastructure Priorities that link into the wider city region. The Mayor will work with authorities outside London on the **cross-boundary implications** of Opportunity Areas.

Supporting London's growth

2.1.10 The Mayor will put in place **resources and support** – such as his Good Growth Fund – to ensure that the potential of London's growth corridors and Opportunity Areas is maximised. The Mayor's London Housing Strategy and Transport Strategy set out his policies to achieve this.

2.1.11 The **London Housing Strategy** sets out four principal approaches:

1. Land assembly, where the Mayor will both directly assemble land for development and support boroughs, Housing Associations and other homebuilders to do so. This may be through direct investment or through supporting compulsory purchase of appropriate land. He will also focus resources on areas where land suitable for development is not coming forward.
2. Investing in housing and infrastructure, where the Mayor will put in place funding mechanisms to unlock development. This could include working with Transport for London to ensure transport improvements lead to increased delivery of homes and jobs, and will build on the current Housing Zones programme.
3. Diversifying the tenure mix of new homes, where the Mayor will provide funding to increase the number of new and affordable homes. This will include funding to support more innovative forms of housing delivery.
4. Increasing capacity, where the Mayor will lead an improvement in the skills, capacity and building methods of the construction industry.

2.1.12 The **Mayor's Transport Strategy** seeks to ensure that public transport and walking and cycling provision are at the heart of planning for Opportunity Areas. It sets out that the Mayor will support growth in Opportunity Areas through

transport investment and planning, and commits to setting ambitious mode share targets.

2.1.13 In the Mayor's Transport Strategy a number of priority infrastructure schemes have been identified that would bring significant regeneration benefits, including the potential to unlock substantial homes and jobs growth in specific Opportunity Areas. The development value in these areas can, in some cases, also contribute to the funding of schemes. In order to support these priorities, this Plan sets out **further guidance on the Opportunity Areas below**, grouped by growth corridor. The general location of each one is set out in a series of diagrams. These also show indicative guideline figures for housing and employment capacity in each area. The capacity of many of these areas for new homes and jobs will increase significantly as a result of major public transport schemes and the improvements to capacity and connectivity they provide. Homes and jobs figures will be reviewed as infrastructure schemes are confirmed and delivery timescales become clearer so that they maximise the opportunities for additional growth. Where development proposals are emerging and transport investment is not yet fully secured, delivery of the long-term capacity for homes and jobs will need to be phased in a way that maximises the benefits of major infrastructure and services investment whilst avoiding any unacceptable effects on existing infrastructure before schemes are delivered.

Table 2.1 - Opportunity Area Indicative capacity for new homes and jobs

Opportunity Area	Indicative homes*	Indicative jobs^
Bakerloo Line Extension		
Old Kent Road	12,000	5,000
New Cross/Lewisham/Catford	13,500	4,000
Bromley	2,500	2,000
Deptford Creek/Greenwich Riverside	5,500	3,000
Crossrail 2 South		
Kingston	9,000	5,000
Wimbledon/Colliers Wood/South Wimbledon	5,000	6,000
Clapham Junction	2,500	2,500
Crossrail 2 North		
Lee Valley	21,000	13,000
Wood Green	4,500	2,500
New Southgate	2,500	3,000
Thames Estuary North and South		
Poplar Riverside	9,000	3,000
Royal Docks/Beckton Riverside	30,000	41,500
London Riverside	44,000	29,000
Greenwich Peninsula	17,000	15,000
Charlton Riverside	8,000	1,000
Woolwich	5,000	2,500
Thamesmead/Abbey Wood	8,000	4,000
Bexley Riverside	6,000	19,000
Highspeed 2/Thameslink		
Harrow and Wealdstone	5,000	1,000
Wembley	14,000	13,500
Colindale/Burnt Oak	7,000	2,000
Brent Cross/Cricklewood	9,500	26,000
Old Oak/Park Royal	25,500	65,000
Elizabeth Line East		
Olympic Legacy	39,000	65,000
Ilford	6,000	500
Romford	5,000	500
Heathrow/Elizabeth Line West		
Heathrow	13,000	11,000
Hayes	4,000	1,000

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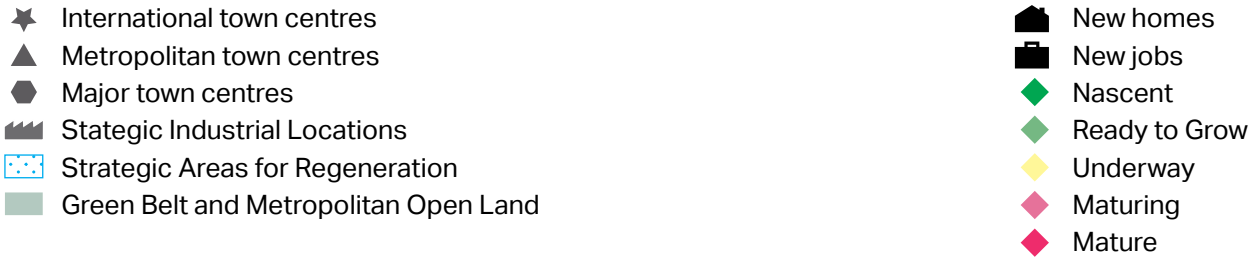
Opportunity Area	Indicative homes*	Indicative jobs^
Southall	9,000	3,000
White City	7,000	2,000
Earls Court/West Kensington	6,500	5,000
Great West Corridor	7,500	14,000
Kensal Canalside	3,500	2,000
Old Oak Park Royal	25,500	65,000
Central London		
Paddington	1,000	13,000
Victoria	1,000	4,000
Tottenham Court Road	300	6,000
Euston	2,800 - 3,800	8,600 - 15,000
King's Cross	1,000	25,000
City Fringe/Tech City	15,500	50,500
Vauxhall Nine Elms Battersea	18,500	18,500
Waterloo	1,500	6,000
London Bridge/Bankside	4,000	5,500
Elephant & Castle	5,000	10,000
Canada Water	5,000	20,000
Isle of Dogs	29,000	110,000
Trams Triangle/London-Gatwick-Brighton mainline		
Croydon	14,500	10,500
Sutton	5,000	3,500

* Homes figure based on 2017 SHLAA capacity from 2019 – 2041. If no SHLAA data available, most recent Development Plan or OA threshold figure used.

^ Jobs figure based on the London Employment Sites Database for the period 2016 to 2041. Where no figure available, most recent Development Plan used.

Figure 2.3 - Key to symbols on the growth area figures

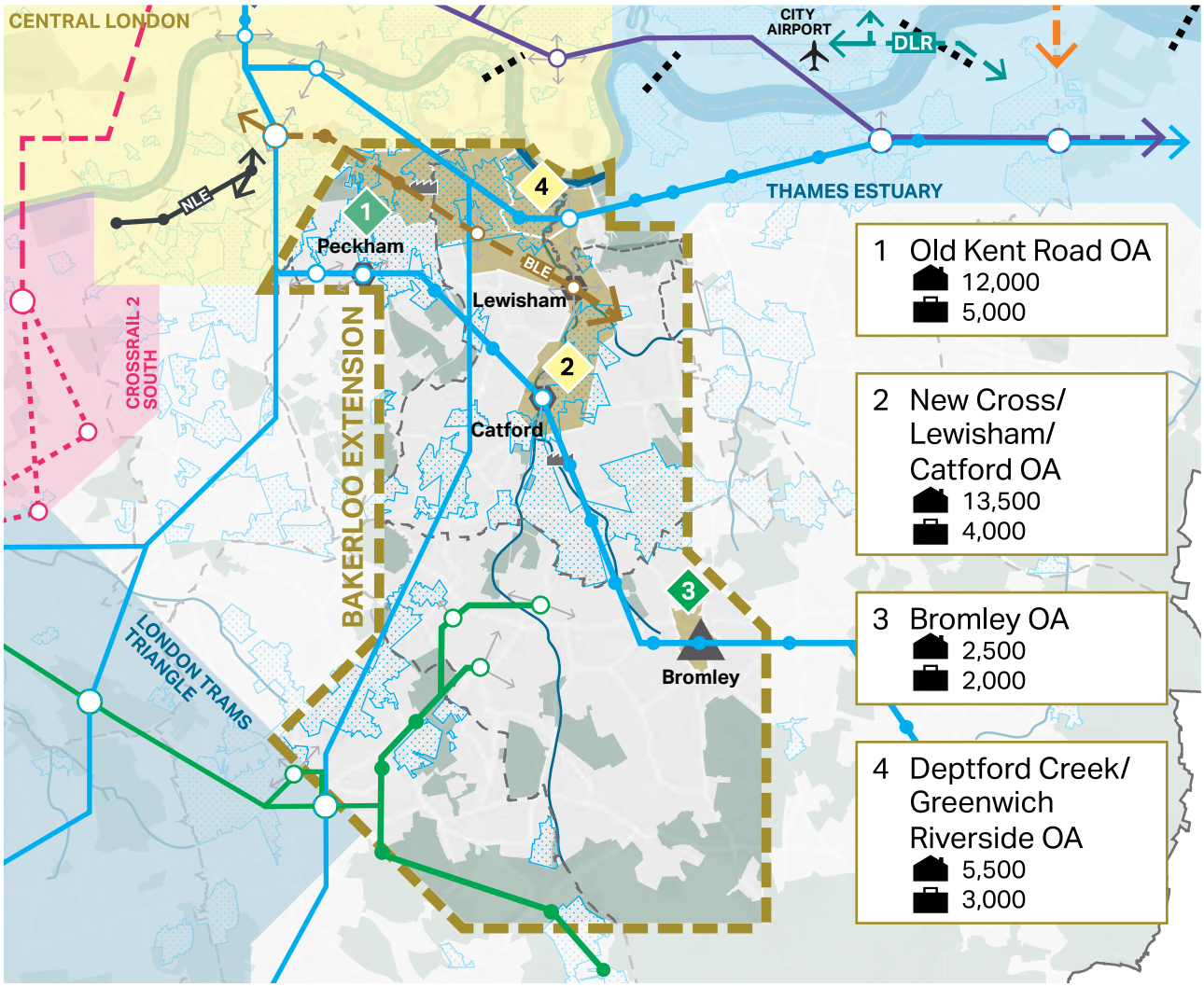


Bakerloo Line Extension

2.1.14 The Mayor is proposing to extend the Bakerloo line from Elephant & Castle to Lewisham and beyond, serving Old Kent Road and New Cross Gate. The extension will improve connectivity, increase the capacity and resilience of the transport network and reduce journey times between key destinations. This will help London to grow by supporting new homes and jobs.

2.1.15 The Mayor has concluded that an extension to Lewisham via Old Kent Road and New Cross Gate is the best option for an initial Bakerloo line extension. There is also the potential for future extensions of the scheme beyond Lewisham. Planning frameworks should identify the development opportunities which are made possible as a result of the Bakerloo line extension, as well as how this would be phased to reflect the connectivity and capacity benefits it unlocks.

Figure 2.4 - Bakerloo Line Extension (BLE)



Old Kent Road OA

2.1.16 Southwark is preparing an Area Action Plan (AAP) which will set out how the BLE will enable significant residential and employment growth. The Old Kent Road OA contains the last remaining significant areas of Strategic Industrial Locations that lie in close proximity to the CAZ and the only SILs within Southwark. The AAP should set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a

wider range of commercial uses within designated town centres. Workspace for the existing creative industries should also be protected and supported.

2.1.17 Any new town centres should be designated close to the potential new Tube stations and should be of an appropriate scale, taking into account capacity and the impact on nearby centres. Burgess Park is a significant open space and a substantial part of the identity of the Old Kent Road. The need for the additional public open spaces the area will require as it evolves, and its broad location and scale, should be set out as part of the AAP.

New Cross/Lewisham/Catford OA

2.1.18 There remain significant opportunities for redevelopment especially around stations, which should complement the existing education, leisure, employment and retail offer in New Cross as well as provide additional housing alongside public realm and highways improvements. The proposal for a Bakerloo line extension station at New Cross Gate will enable delivery of these developments and improvements. The area has an established commercial centre capable of supporting commercial expansion and diversification, building on the existing assets such as Goldsmiths College, University of London areas of artistic and cultural character. Development should improve north-south connections and pedestrian and cycling movement across and along the traffic-dominated New Cross Road (A2) as well as connectivity between New Cross Gate and surrounding communities.

2.1.19 Lewisham will grow in function and population and has potential to become a town centre of Metropolitan importance. The town centre retail and commercial functions are being intensified, rationalisation of the public highway will create improved pedestrian routes, and significant residential developments surrounding the town centre are underway, including Lewisham Gateway. The potential for further growth at Lewisham will be supported by the arrival of the Bakerloo line at Lewisham Interchange. This will bring enhanced access to central London and encourage the delivery of employment, leisure, service and community uses that serve the local and sub-regional population. Public realm and environmental enhancements of the town centre and surrounding employment, mixed-use and residential re-developments will continue to be delivered and will assist the continued transformation of Lewisham into a high performing and vibrant retail hub with excellent leisure services.

2.1.20 Catford has potential for significant urban renewal. Large-scale redevelopment of five key sites – Catford Shopping Centre and Milford Towers, Laurence House, Town Hall and Civic Centre, Plassy Island, Wickes and Halfords – will help to transform the town centre by 2026. There is scope to restore the fractured town

centre and to re-invigorate it by boosting the existing civic and cultural facilities and by providing an improved retail, office and leisure offer. To support the area, approximately 2,700 new homes can be accommodated in the heart of the town centre. The realignment of the A205 will assist in the transformation of the town centre. In the longer term, the potential routing of the Bakerloo line extension Phase 2 through Catford could unlock further development potential elsewhere in the town centre and beyond.

Crossrail 2

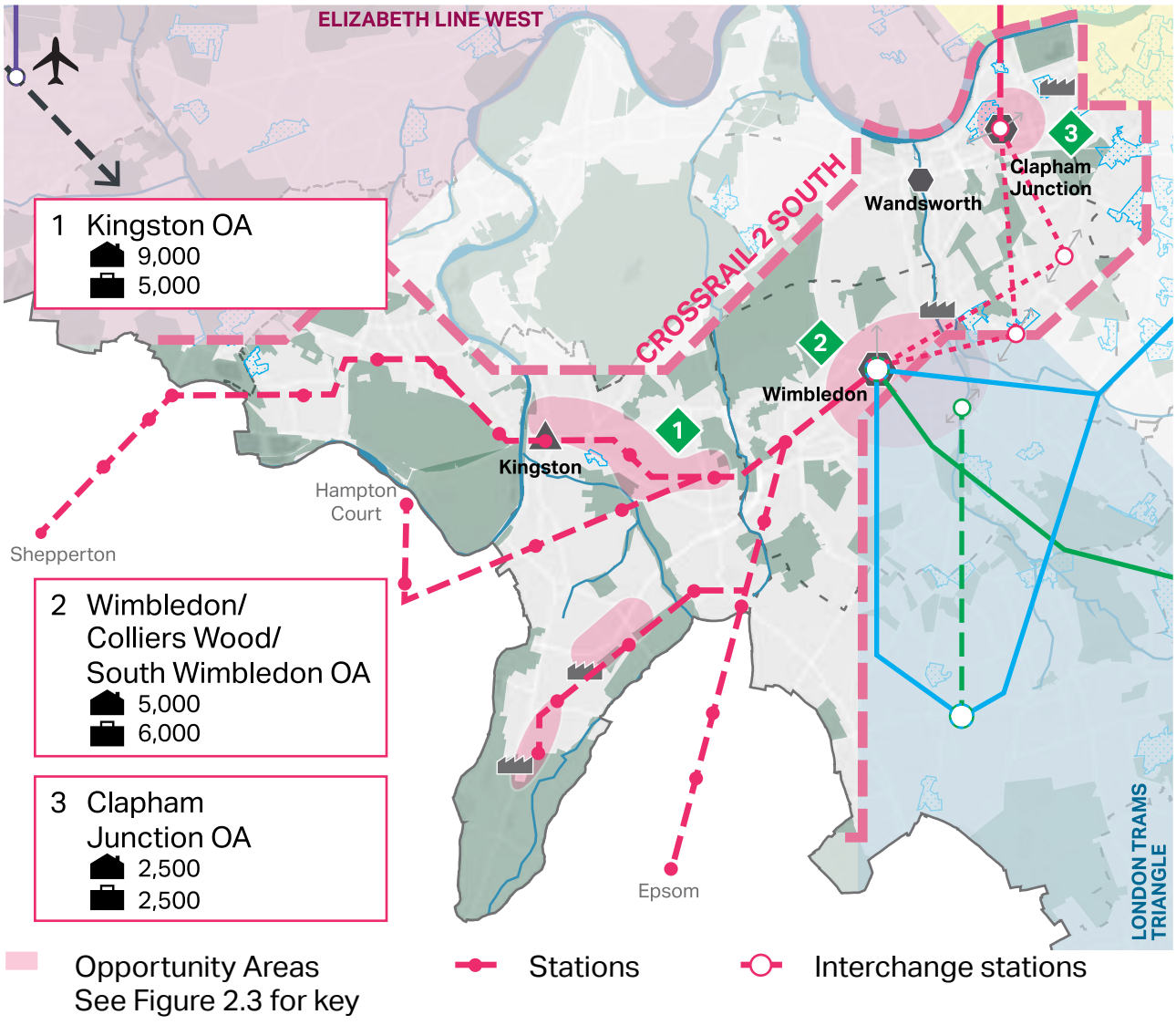
2.1.21 Crossrail 2 is a proposed new railway serving London and the Wider South East. To the south, it will connect the South West Mainline via new tunnels from Wimbledon, through central London to New Southgate and Tottenham Hale where it will connect with the West Anglia Mainline. As well as reducing journey times, increasing capacity, and reducing crowding across London's transport network, it will transform connectivity to and from key growth areas across London and beyond. It will support up to 200,000 new homes and 200,000 new jobs, connecting some of London's major growth locations with potential strategic growth locations outside London.

2.1.22 It is anticipated that Crossrail 2 will be operational in the 2030s. The Mayor has submitted the Strategic Outline Business Case for the scheme to the Government. Crossrail 2 and associated investment will have a significant impact on the locations it serves and the wider catchments of stations and linked services. This regeneration impact will help support the delivery of housing, mixed-use and commercial development across the corridor and the opportunity areas located within it, as described below. Planning frameworks for all areas affected by Crossrail 2 should respond to the significant development capacity unlocked by Crossrail 2. Frameworks should outline how this additional development capacity would be phased to reflect the transport connectivity and capacity improvements that Crossrail 2 enables.

2.1.23 Beyond London's boundaries Crossrail 2 is part of two Strategic infrastructure Priorities (see Figure 2.15 (4) and (10)).

Crossrail 2 South

Figure 2.5 - South West London/Crossrail 2 South



Kingston OA

2.1.24 The Royal Borough of Kingston upon Thames's network of town centres with their good levels of public transport accessibility have been identified as areas capable of accommodating development and intensification to provide leisure, cultural and night-time activity, commercial and retail uses, as well as high density housing. A Direction of Travel document was adopted in 2016 to guide

planning policies in these areas. In particular it identified four areas where there is scope for significant change:

- Kingston Town Centre
- Norbiton, London Road and Cambridge Road Estate
- New Malden
- Tolworth

2.1.25 These areas are capable of supporting some development in the short and medium term. However, once Crossrail 2 is operational, the borough will benefit from more Crossrail 2 stations than any other and the arrival of the new, higher frequency, higher capacity service will enable significant additional growth opportunities in these areas. It will improve Kingston's attractiveness as an office location and therefore support additional commercial growth in the town centre, building on links with Kingston University and Kingston College. The Local Plan and/or Planning Framework should set out how Crossrail 2 will support and deliver further growth and intensification in these areas. It should also explore how the use of industrial land can be intensified to make more efficient use of land. Kingston town centre, with its ancient market is rich in heritage and forms an important part of the setting of Hampton Court Palace, its gardens, the Thames and surrounding Royal Parks.

2.1.26 In the longer term, and following the opening of Crossrail 2 in the 2030s, there may be potential for selective redevelopment in the following areas:

- Berrylands Station and Hogsmill Valley
- Chessington

Wimbledon/South Wimbledon/Colliers Wood OA

2.1.27 The step change in transport capacity and connectivity offered by Crossrail 2 will transform Wimbledon into a major transport hub with opportunities for interchange with National Rail, trams and the Underground. The redevelopment required to deliver the Crossrail 2 tunnel offers the opportunity to plan for significant growth and intensification, with residential and commercial development. Crossrail 2 will strengthen Wimbledon's role as a Major town centre, and as a location with potential for speculative office development, helping to meet the Mayor's ambition to promote growth in employment in outer London centres. The planning framework should also explore and quantify the opportunities for development associated with Crossrail 2 in the surrounding area, and how the use of industrial land can be retained and intensified to make

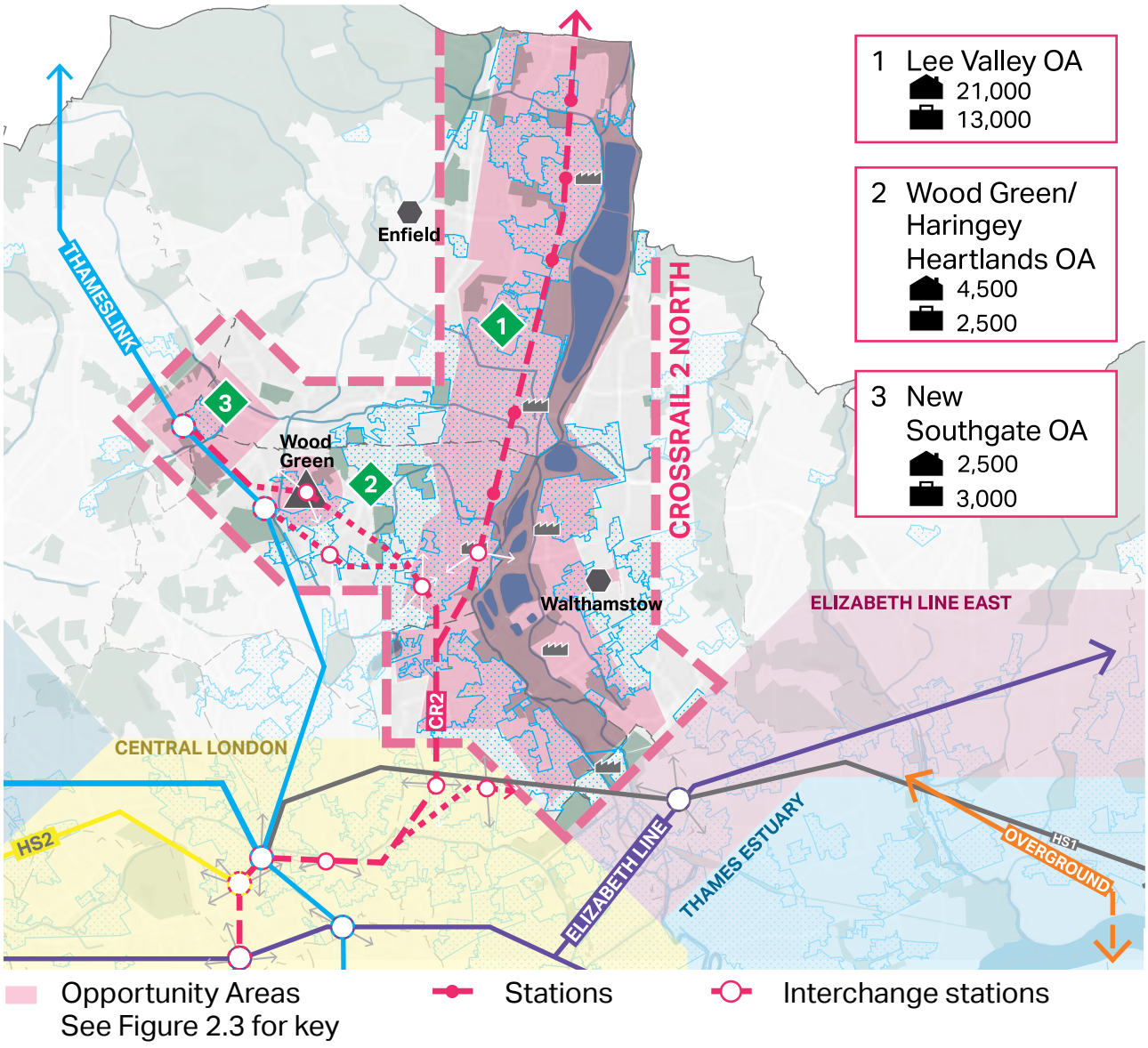
more efficient use of land. The planning framework should also explore the potential for development at Morden Town Centre.

Clapham Junction OA

2.1.28 Clapham Junction is Europe's busiest rail interchange station, serving key commuter routes from West London and Southern England, and is identified as one of London's four strategic interchanges expected to accommodate rising levels of demand. However, the station is already operating at capacity in terms of rail services and passenger numbers and suffers from over-crowding at peak times. Reconfiguration of the existing rail infrastructure and the station is needed to increase capacity and substantially improve passengers' public transport experience. The proposal for a Crossrail 2 station represents a unique opportunity to make more efficient use of land surrounding the station for residential and commercial development, including new offices as part of the designated Major town centre. The Planning Framework will need to fully explore and evaluate options for comprehensive over-station development, which would be reliant on a reconfiguration of the station layout. This will include the consideration of complex technical issues related to the operation of the railway and the integration with other transport infrastructure and services, including Crossrail 2. Careful consideration will need to be given to the urban design and place-making of the development and its integration into the existing streets and functions surrounding the station. It will be important to consider integration of any development with surrounding residential areas, and the Housing Zone.

Crossrail 2 North

Figure 2.6 - Lee Valley, New Southgate and Wood Green/Crossrail 2 North



Lee Valley OA

2.1.29 The Lee Valley occupies a strategic position in the London-Stansted-Cambridge-Peterborough growth corridor and provides a range of development opportunities for higher density development. These opportunities include the growth at Tottenham Hale, Blackhorse Lane, Meridian Water, Ponders End, Lea

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Bridge and Leyton, Stamford Hill, Clapton and the Lea Bridge roundabout, as well as other accessible sites within and on the edges of town centres, especially in the A10 and A1010 corridors. Crossrail 2 will transform transport connectivity and capacity in the Upper Lee Valley and is vital to support the full, long-term potential development capacity.

2.1.30 In the shorter term, a four-trains-per-hour service on the West Anglia Main Line at Meridian Water and Northumberland Park will support development and regeneration. Beyond this, four tracking of the line between Coppermill Junction and Broxbourne can unlock development capacity along the route.

2.1.31 Development in the Opportunity Area should fully capture the benefits of these significant transport interventions and provide the stimulus for regeneration, broadening employment opportunities for existing communities including those in Edmonton, the Tottenham corridor from Stoke Newington to Northumberland Park, and around Blackhorse Lane and Walthamstow.

2.1.32 The Lee Valley is ideally located for freight and logistics, straddling both the North Circular and M25, and providing a link to Stansted, Cambridge and beyond in the north, and to Central London in the south. It will continue to play an important strategic role in providing industrial and logistics functions to support the wider London economy and contribute to local employment.

2.1.33 The Planning Framework should quantify the full development potential of the area as a result of Crossrail 2. It should ensure that industrial, logistics and commercial uses continue to form part of the overall mix of uses in the area, and that opportunities for intensification of industrial land and co-location of industrial and residential uses are fully explored. Tottenham and Walthamstow contain clusters of creative industries which should be protected and supported. The Planning Framework should also protect and improve sustainable access to the Lee Valley Regional Park and reservoirs, and ensure links through to Hackney Wick and the Lower Lea Valley. Planning frameworks should include an assessment of any effects on the Epping Forest Special Area of Conservation and appropriate mitigation strategies.

Wood Green/Haringey Heartlands OA

2.1.34 A range of development opportunities will be delivered with the aim of creating a revitalised employment-led Metropolitan town centre. The area benefits from excellent, and – subject to confirmation of Crossrail 2 coming to the area – improving public transport connections and capacity, which make Wood Green an ideal location for growth in employment and service provision to serve the central portion of north London. Key sites with development potential include the Clarendon Road gas works and adjacent Wood Green Cultural Quarter, as

well as significant publicly-owned land parcels around the High Road, and Wood Green Shopping City. Mixed-use regeneration of these sites will deliver an expanded employment, retail and leisure offer, as well as new homes.

2.1.35 The Planning Framework should quantify the scale of development associated with Crossrail 2, promote the opportunity to build on the area's industrial heritage through new and refurbished workspace in the west of the area, and support retail provision. It should also set out how site assembly and provision of better links with the town centre and surrounding areas including Alexandra Palace Park hold the key to comprehensive development.

New Southgate OA

2.1.36 The arrival of Crossrail 2 at New Southgate can significantly enhance accessibility and connectivity to support regeneration in the wider area. The Planning Framework should review the development capacity of this area in the light of Crossrail 2. Initial estimates indicate that this could be significantly greater than the current estimated capacity for new homes and jobs.

2.1.37 The benefits of the existing good public transport accessibility to the north and east are hampered by the severance effect of major transport corridors through the area. The area to the west of the East Coast Main Line and to the south of the A406 North Circular suffer from poor quality environment and lack of proper connections to the stations and the wider area. The high traffic flows on the North Circular Road have a dominant and adverse impact on local residents and businesses by way of congestion, noise, air pollution and poor public realm along the corridor.

2.1.38 There is potential to deck over a small section of the North Circular immediately to the south of New Southgate Station and/or tunnel a section of the North Circular between New Southgate and Green Lanes. The Planning Framework should also consider the benefits and viability of these options including their potential to unlock the delivery of new homes and jobs as well as complement other transport initiatives in the area and the wider environmental, health and public realm benefits.

Thames Estuary North and South

2.1.39 The corridor either side of the Thames Estuary represents the largest concentration of Opportunity Areas in the city. It continues to be a priority for regeneration and economic development, with potential for over 250,000 new homes and 200,000 new jobs.

2.1.40 Development in a number of the Opportunity Areas in this corridor is coming forward at a fast pace, with significant development in the Isle of Dogs, Greenwich Peninsula and Woolwich. Others are about to benefit from new transport infrastructure, such as Barking Riverside with the extension of the Overground, and Thamesmead/Abbey Wood with the Elizabeth line. Others are dependent on the development of infrastructure schemes in order to unlock their full potential, such as Bexley Riverside.

2.1.41 The Mayor has set out his vision to transform the Thames Estuary into a hub for large-scale state-of-the-art production facilities with an initial focus on creative and cultural industries. In their Local Plans, boroughs should consider how to encourage and support large-scale production facilities to create jobs, enhance the skills of local people and drive growth to benefit the area.

2.1.42 The Mayor will continue to work with Thames Estuary partners to support and promote investment in the area, both within and outside London.

2.1.43 The lack of river crossings in the area is holding back growth and development, and the Mayor has prioritised or is exploring a number of schemes which will help to unlock and/or connect growth areas:

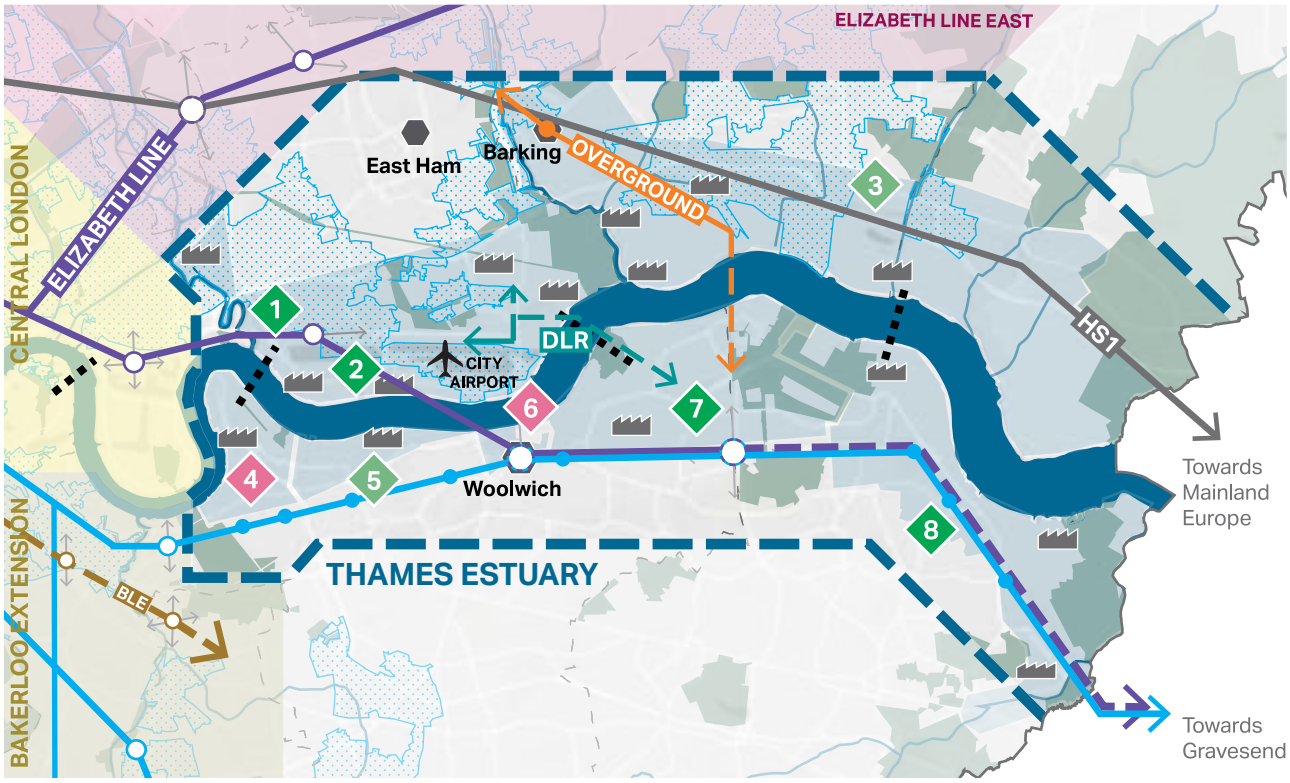
- Silvertown Tunnel
- a new river crossing linking Rotherhithe and Canary Wharf
- an extension of the DLR across the river from Gallions Reach to Thamesmead and beyond
- Barking Riverside to Abbey Wood London Overground crossing.

2.1.44 The Mayor will also support the Thames Gateway Kent Strategic Corridor by assisting boroughs in seeking a Government-led project to extend the Elizabeth line through Bexley to north Kent.

2.1.45 This corridor links beyond London's boundaries into two Strategic Infrastructure Priorities (see Figure 2.15 (6) and (7)).

Thames Estuary

Figure 2.7 - Thames Estuary



Opportunity Areas
See Figure 2.3 for key

1 Poplar Riverside OA
- 9,000
- 3,000

2 Royal Docks and Beckton Riverside OA
- 30,000
- 41,500

3 London Riverside OA
- 44,000
- 29,000

Stations
Interchange stations

4 Greenwich Peninsula OA
- 17,000
- 15,000

5 Charlton Riverside OA
- 8,000
- 1,000

6 Woolwich OA
- 5,000
- 2,500

Potential / proposed / planned river crossings

7 Thamesmead and Abbey Wood OA
- 8,000
- 4,000

8 Bexley Riverside OA
- 6,000
- 19,000

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Poplar Riverside OA

2.1.46 Poplar Riverside lies south of the Olympic Legacy Supplementary Planning Guidance area, and between the Isle of Dogs & South Poplar and Royal Docks Opportunity Areas. The new OA designation incorporates parts of the Lower Lee Valley area that are outside the Olympic SPG and LLDC areas. It contains the Poplar Riverside Housing Zone on the Tower Hamlets side of the River Lea. This has the potential for 9,000 new homes and improved connectivity in a part of the borough with significant infrastructure challenges.

2.1.47 The OA crosses the boundary of the River Lea into the London Borough of Newham, where there are opportunities to provide both intensified employment uses and residential development. Cross-boundary working is required to maximise investment of the Housing Zone funding and the development potential of upgrades to Canning Town station and the arrival of the Elizabeth line at Custom House. Significant local transport improvements are needed to allow better pedestrian and cycle accessibility over the River Lea via footbridges and to remove the severance effect of major infrastructure such as DLR lines and the A12 at Gillender Street.

Royal Docks OA

2.1.48 This area sits at the heart of the Thames Gateway presenting one of the largest regeneration opportunities in London. It benefits from the presence of important existing industry and attractors such as ExCEL and City Airport, and will soon see an Elizabeth line station at Custom House. The Royal Docks will become a vibrant new London quarter, creating a world-class business, industrial, cultural and residential district. Key to delivering this will be ensuring high-quality development with new infrastructure, homes and workspaces, including creative cultural, evening and night-time economy uses, in recognition of the Mayor's aspiration for a Thames Estuary Production Corridor for culture and creative industries.

2.1.49 Significant housing-led mixed-use developments have already been completed or are underway, such as Royal Wharf, Barrier Park East, Gallions Quarter and Great Eastern Quays. The consented major new mixed-use schemes at Advanced Business Parks (London) and Silvertown Quay will contribute to the transformation of the area.

2.1.50 The Mayor has established the Royal Docks Delivery Team to guide development of the Enterprise Zone and surrounding Opportunity Area. The area contains a number of safeguarded wharves, and there is a continuing need to retain wharf capacity. The Planning Framework should set out how wharves could be

consolidated to deliver more effective and efficient industrial uses alongside residential/mixed use. The area has significant areas of SIL and recent evidence confirms that there is a continued demand for industrial space in the east of London. The Planning Framework should ensure industrial capacity is managed in ways that reduce overall vacancy rates and support the intensification of industrial, logistics and commercial uses so that they continue to form part of the overall mix of uses in the area.

2.1.51 The Planning Framework should also set out how to manage the opportunities for mixed-use development at Canning Town/West Ham, and Thameside West where there is or will be excellent public transport connectivity. Silo D is a heritage asset at risk which provides opportunities for heritage and cultural-led regeneration. At Beckton Riverside de-commissioning of the gasholders together with a new DLR station provides an opportunity to deliver waterside residential-led mixed-use development. New residential development here will support the evolution of Gallions Shopping Centre, which has the potential to become a designated town centre. The Planning Framework should set out how new development can accommodate an extension of the DLR across the river to Thamesmead.

2.1.52 The DLR provides the key transport links through the area, and Beckton Depot will be retained and expanded to support the upgrade of the DLR fleet.

Thamesmead and Abbey Wood OA

2.1.53 Housing Zone status and investment by Peabody in estate renewal in the area will improve the quality of the environment and bring new housing opportunities. To deliver wider regeneration benefits to Thamesmead, other interventions to support the growth of the Opportunity Area are needed. These include: the redevelopment and intensification of employment sites to enable a range of new activities and workspaces to be created in parallel with new housing development; a review of open space provision in the area to create better quality, publicly accessible open spaces; the creation of a new local centre around Abbey Wood station, the revitalisation of Thamesmead town centre and Plumstead High Street; and improved local transit connections.

2.1.54 Alongside the opening of the Elizabeth line, major investments in transport infrastructure such as the proposed DLR extension from Gallions Reach are also needed to support high density development and provide access to areas of significant employment growth, such as the Royal Docks, for existing and new residents of Thamesmead. To accommodate the expected growth in the area, utility infrastructure – in particular water and electricity supply, broadband and a local heat network – should be upgraded and/or planned for accordingly. In view

of the low-lying nature of parts of the area, particular attention should also be given to flood risk management.

Bexley Riverside OA

2.1.55 The Bexley Riverside OA stretches along the south side of the Thames and includes the areas of Belvedere, Erith, Slade Green and Crayford. Future improvements to accessibility through better services on the existing transport network, and the extension of the Elizabeth line to Slade Green and beyond, offer the opportunity for significant redevelopment around the stations. The Mayor will support the borough and the adjoining Kent authorities in seeking a Government-led extension of the Elizabeth line. In the interim, within London, the Planning Framework should explore the level of growth that could be supported through significantly enhanced bus services and priority measures.

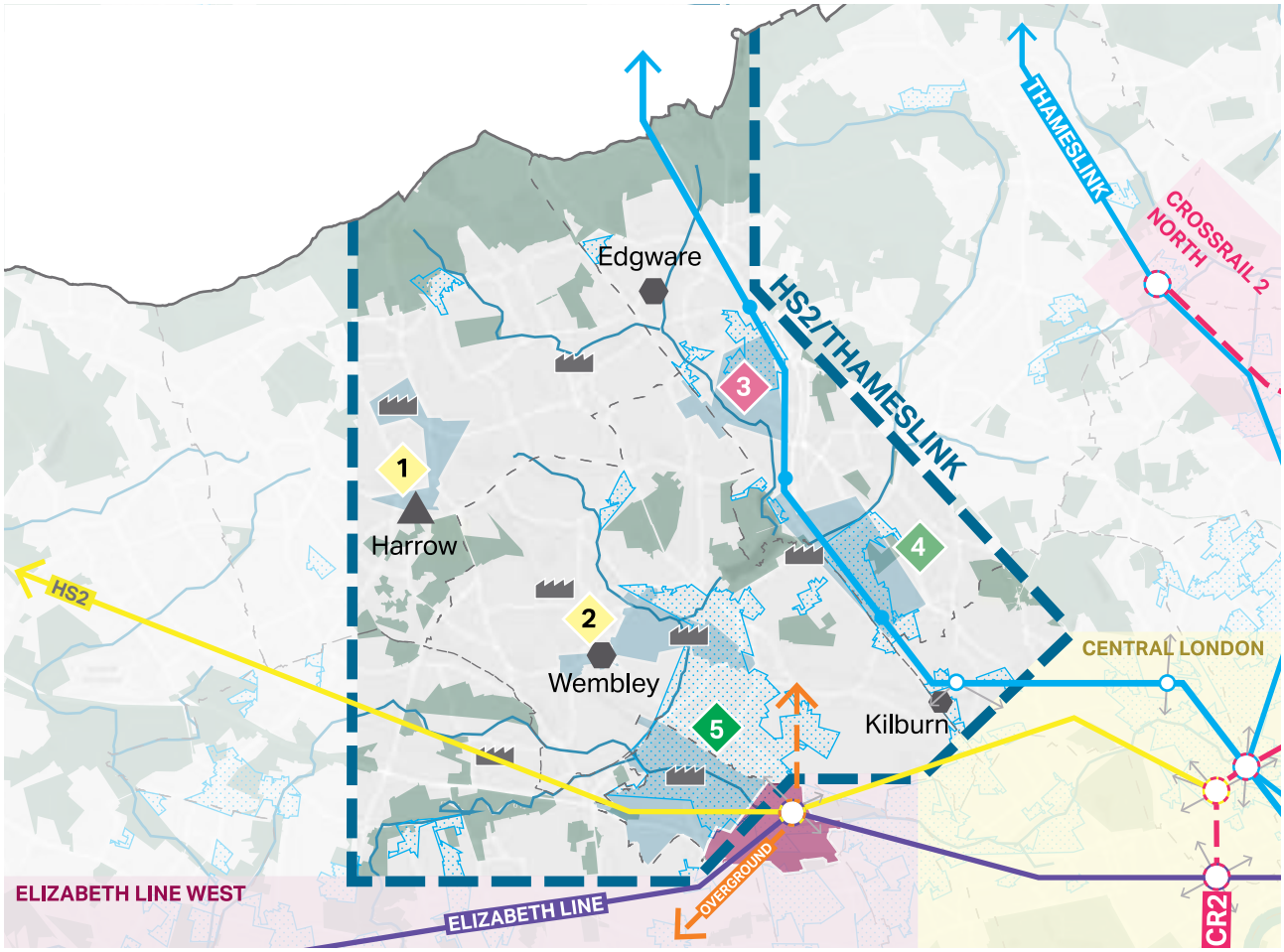
2.1.56 Industrial and logistics uses will continue to play a significant role in the area. Belvedere is recognised as having potential as a future District centre.

High Speed 2 / Thameslink

2.1.57 At the heart of this area, Old Oak is set to be transformed by the late 2020's with the opening of Old Oak Common Station, which will connect the Elizabeth line and National Rail services to the newly built High Speed 2 line. The creation of this new station will dramatically improve public transport in the immediate area, and across London. The boroughs are examining the feasibility of a new rail link from Brent Cross to Hounslow, via Old Oak. This West London Orbital Line could unlock significant new growth in the area.

2.1.58 This corridor links beyond London's boundaries into a Strategic Infrastructure Priority (see Figure 2.15 (12)).

Figure 2.8 - High Speed 2 / Thameslink



Opportunity Areas
See Figure 2.3 for key

Stations

Interchange stations

1 Harrow and Wealdstone OA
5,000
1,000

2 Wembley OA
14,000
13,500

3 Colindale/ Burnt Oak OA
7,000
2,000

4 Brent Cross/ Cricklewood OA
9,500
26,000

5 Old Oak Park Royal OA
25,500
65,000

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Old Oak / Park Royal

2.1.59 The Mayor has established the Old Oak and Park Royal Development Corporation (OPDC) to drive forward regeneration of this area. A Local Plan has been published which recognises the huge regeneration potential of the area and sets out a clear strategy for how redevelopment should help to optimise economic growth and regeneration potential, create a new town centre and bring tangible benefits for local communities and Londoners. Positive masterplanning will be used to create an attractive new town centre with distinctive character.

2.1.60 Old Oak Common station (connecting HS2, the Elizabeth line and National Rail) is set to open by the late 2020's. There are significant opportunities to bring forward regeneration in advance of this date around the existing and potential new rail stations in the area. This includes North Acton on the Central line and Willesden Junction on the Bakerloo line and London Overground, as well as the potential new local stations at Hythe Road and Old Oak Common Lane on the Overground.

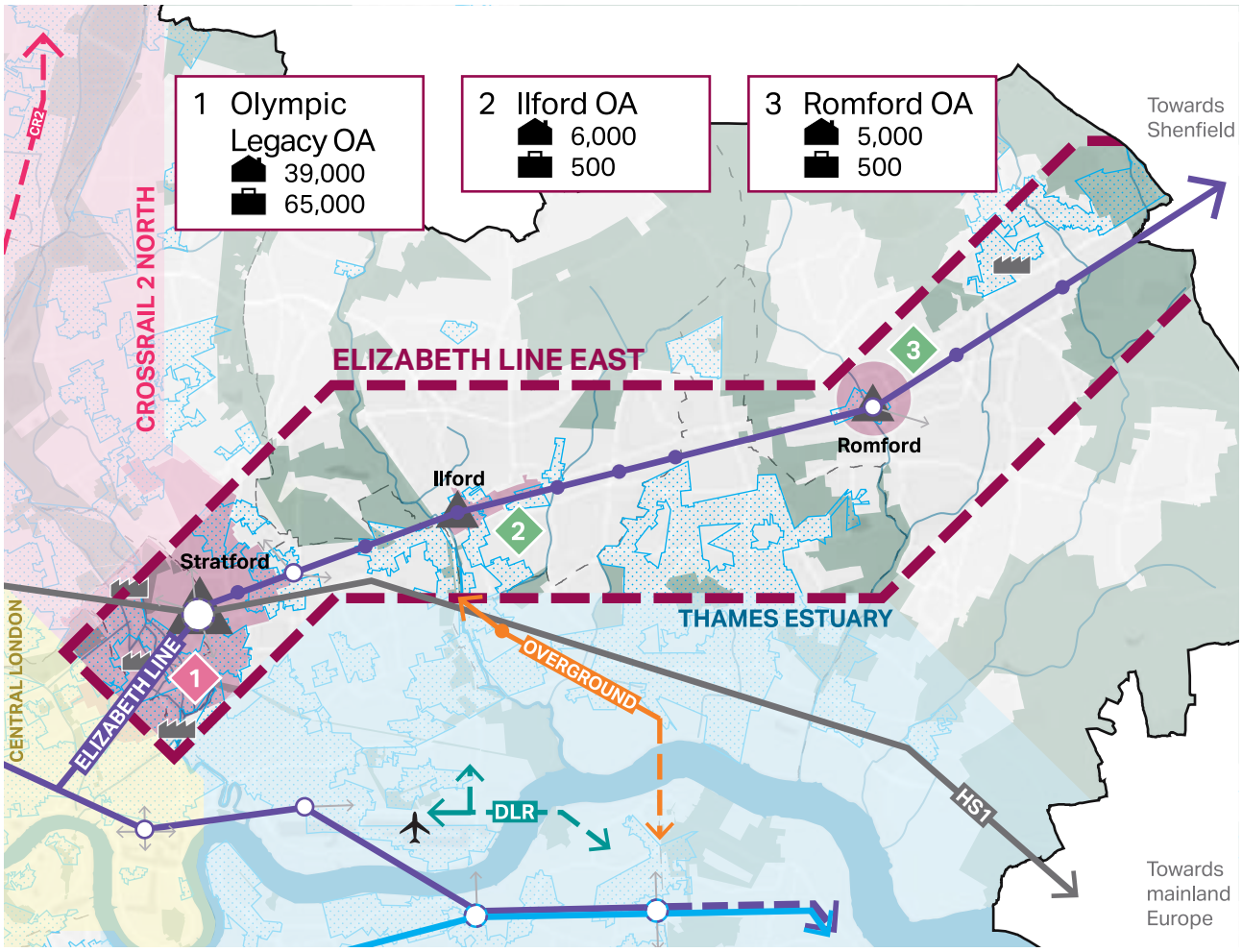
2.1.61 Park Royal is a strategically-important industrial estate for the functioning of London's economy and should be protected, strengthened and intensified.

Elizabeth Line East

2.1.62 The Elizabeth line will transform connectivity along the route. It is already leading to increased development in central London and has the potential to bring forward growth and development from Stratford eastwards. This includes the area of the London Legacy Development Corporation, which continues to secure the legacy of the 2012 Olympic and Paralympic Games.

2.1.63 This corridor links beyond London's boundaries into a Strategic Infrastructure Priority (see Figure 2.15 (5)).

Figure 2.9 - Elizabeth Line East



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Heathrow/Elizabeth Line West

2.1.64 The area contains a range of opportunities to support London's economic development and deliver new housing and environmental improvements. Policy T8 Aviation confirms that the Mayor will oppose any expansion of Heathrow Airport unless it can be shown that: no additional noise or air quality harm would result; the benefits of future regulatory and technology improvements would be fairly shared with affected communities; and that sufficient surface access capacity would be provided by the Government and/or the airport authority.

2.1.65 The Mayor will therefore review and clarify the area's potential contribution to London's growth when expansion proposals and their spatial and environmental implications are clearer. This will include reviewing the housing and jobs targets for opportunity areas and working with boroughs to support more detailed plans, such as through Opportunity Area Planning Frameworks or Local Plans.

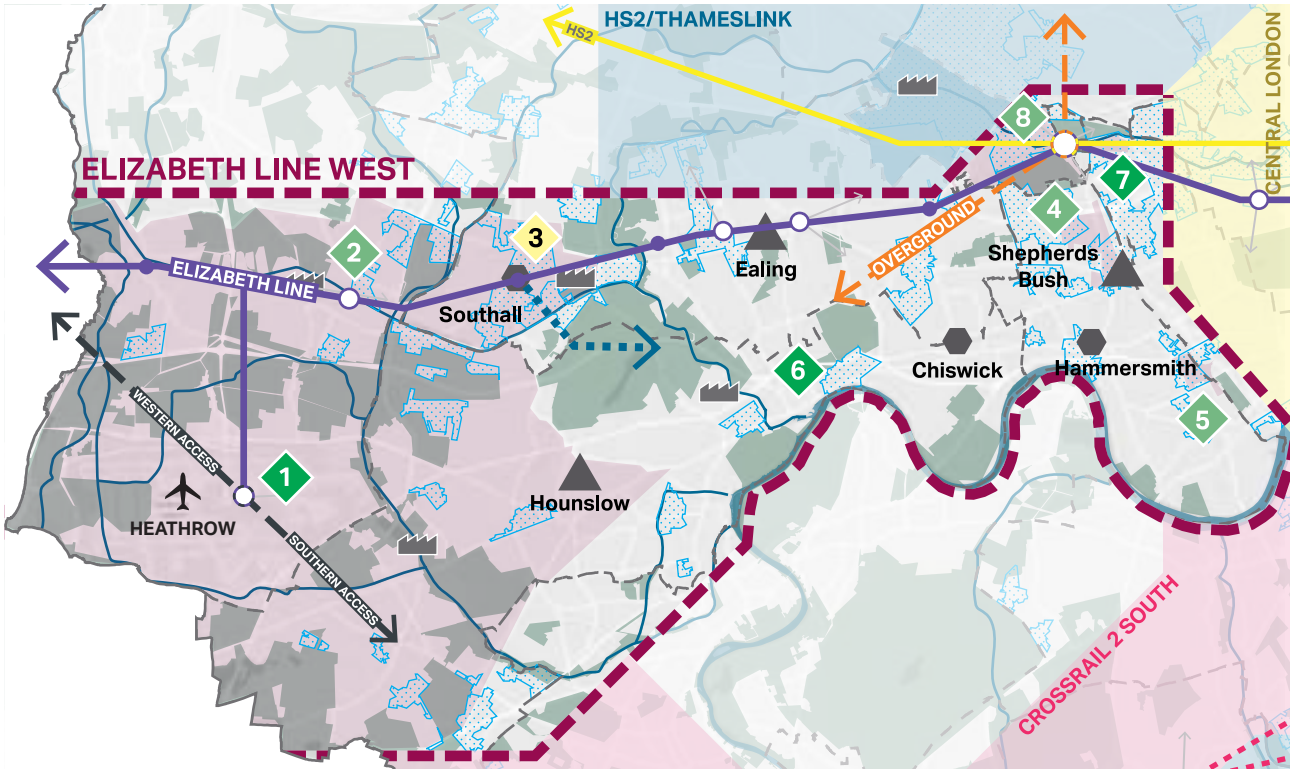
2.1.66 As the implications of Heathrow also go beyond London's boundaries, the Mayor will work with local authority partners beyond London's boundaries on related challenges and opportunities, in line with Policy SD2 Collaboration in the Wider South East and Policy SD3 Growth locations in the Wider South East and beyond.

2.1.67 This corridor links beyond London's boundaries into a Strategic Infrastructure Priority (see Figure 2.15 (11)).

Great West Corridor

2.1.68 The Great West Corridor is one of London's key approaches and presents unique opportunities for place-making. It inspired high-quality Art Deco architecture in the 1930s, creating a distinctive local character. The route is surrounded by some of London's most significant historic landscapes including the River Thames, Syon Park, Gunnersbury Park, Osterley Park and The Royal Botanic Gadens Kew World Heritage Site. Masterplanning in the corridor should carefully consider these natural and historic assets, utilising the latest modelling techniques. The opportunities to integrate and draw inspiration from the area's heritage should be fully explored.

Figure 2.10 - Elizabeth Line West



Opportunity Areas
See Figure 2.3 for key

Stations

Interchange stations

1 Heathrow OA
- 13,000
- 11,000

2 Hayes OA
- 4,000
- 1,000

3 Southall OA
- 9,000
- 3,000

4 White City OA
- 7,000
- 2,000

5 Earls Court and West Kensington OA
- 6,500
- 5,000

6 Great West Corridor OA
- 7,500
- 14,000

7 Kensal Canalside OA
- 3,500
- 2,000

8 Old Oak and Park Royal OA
- 25,500
- 65,000

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Central London

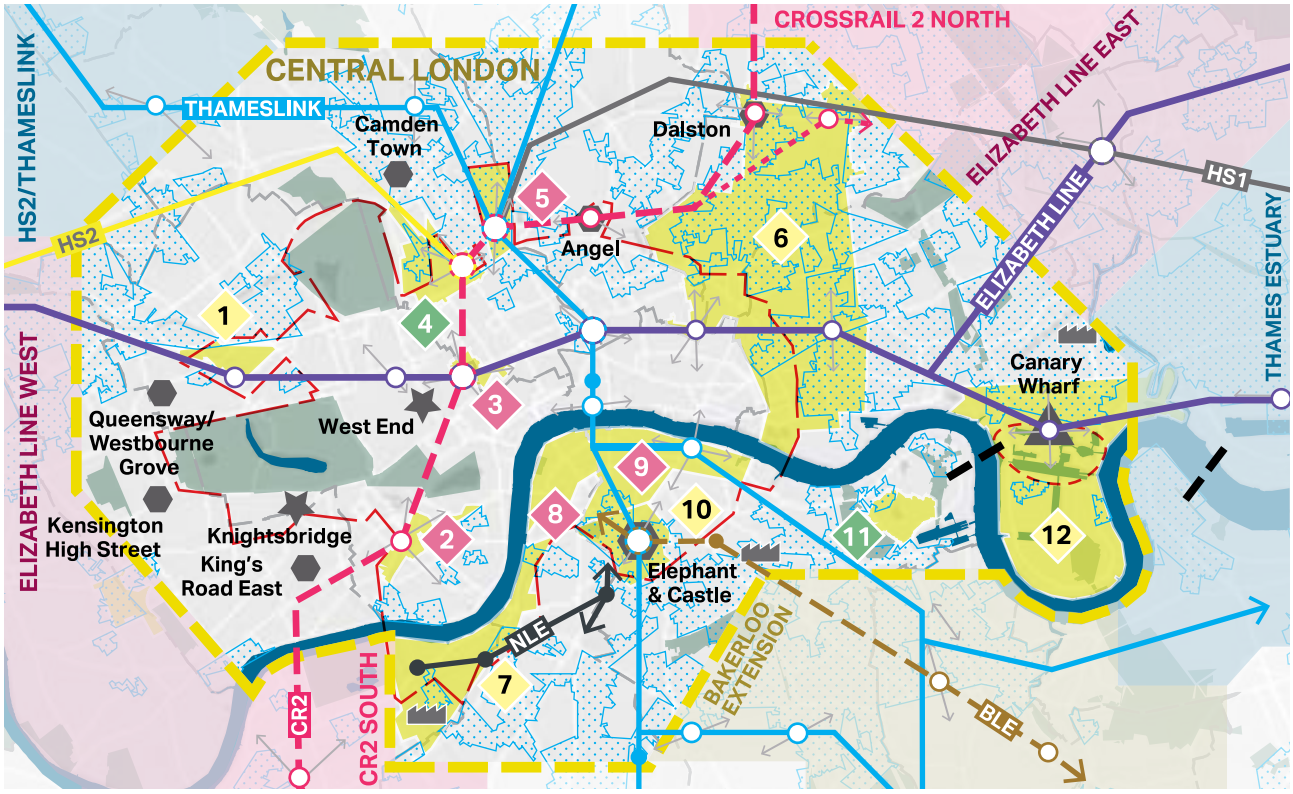
2.1.69 Central London is a key driver for both London's economy and the UK economy as a whole, comprising both the CAZ and Northern Isle of Dogs (see Policy SD4 The Central Activities Zone (CAZ) and Policy SD5 Offices, other strategic functions and residential development in the CAZ) and the closely related areas of Canada Water and City Fringe/Tech City. It contains a large number of OAs, many of which are maturing or underway and benefiting from successful development schemes that will be completed over the next few years.

Euston

2.1.70 Euston is a major national and commuter rail terminal with good public transport links to the rest of the CAZ. The existing mainline station is outdated, the local environment has areas of poor quality, and the over-station airspace and adjacent areas are underused. There is significant potential for intensification and an opportunity to comprehensively transform Euston and the immediate area into a world-class transport interchange and new residential and business district. Scope exists to reconfigure Euston Square Gardens and the bus station to enhance this space and improve transport facilities and to also complement the expanding knowledge quarter. This should support the area's strengths in the Life Sciences and Tech industries. The 'Euston Area Plan' produced by the GLA, working with Transport for London and Camden Council was adopted in 2015.

2.1.71 HS2 has now received Royal Assent and options for the potential redevelopment of the existing station have come forward in addition to proposals for a Crossrail 2 interchange. This could greatly assist in improving interchange capacity in the longer term. Working with the station operators, the GLA and Camden Council, the Department for Transport is seeking to pool the various land interests and secure a development partner to assist in delivering a comprehensive redevelopment at Euston. A planning brief for the area around Euston Station is currently being produced.

Figure 2.11 - Central London



Opportunity Areas
See Figure 2.3 for key

Stations
Interchange stations

CAZ
Northern Isle of Dogs

1 Paddington OA
1,000
13,000

2 Victoria OA
1,000
4,000

3 Tottenham Court Road OA
300
6,000

4 Euston OA
2,800-3,800
8,600-15,000

5 King's Cross OA
1,000
25,000

6 City Fringe/ Tech City OA
15,500
50,500

7 Vauxhaul Nine Elms Battersea OA
18,500
18,500

8 Waterloo OA
1,500
6,000

9 London Bridge Bankside OA
4,000
5,500

10 Elephant & Castle OA
5,000
10,000

11 Canada Water OA
5,000
20,000

12 Isle of Dogs OA
29,000
110,000

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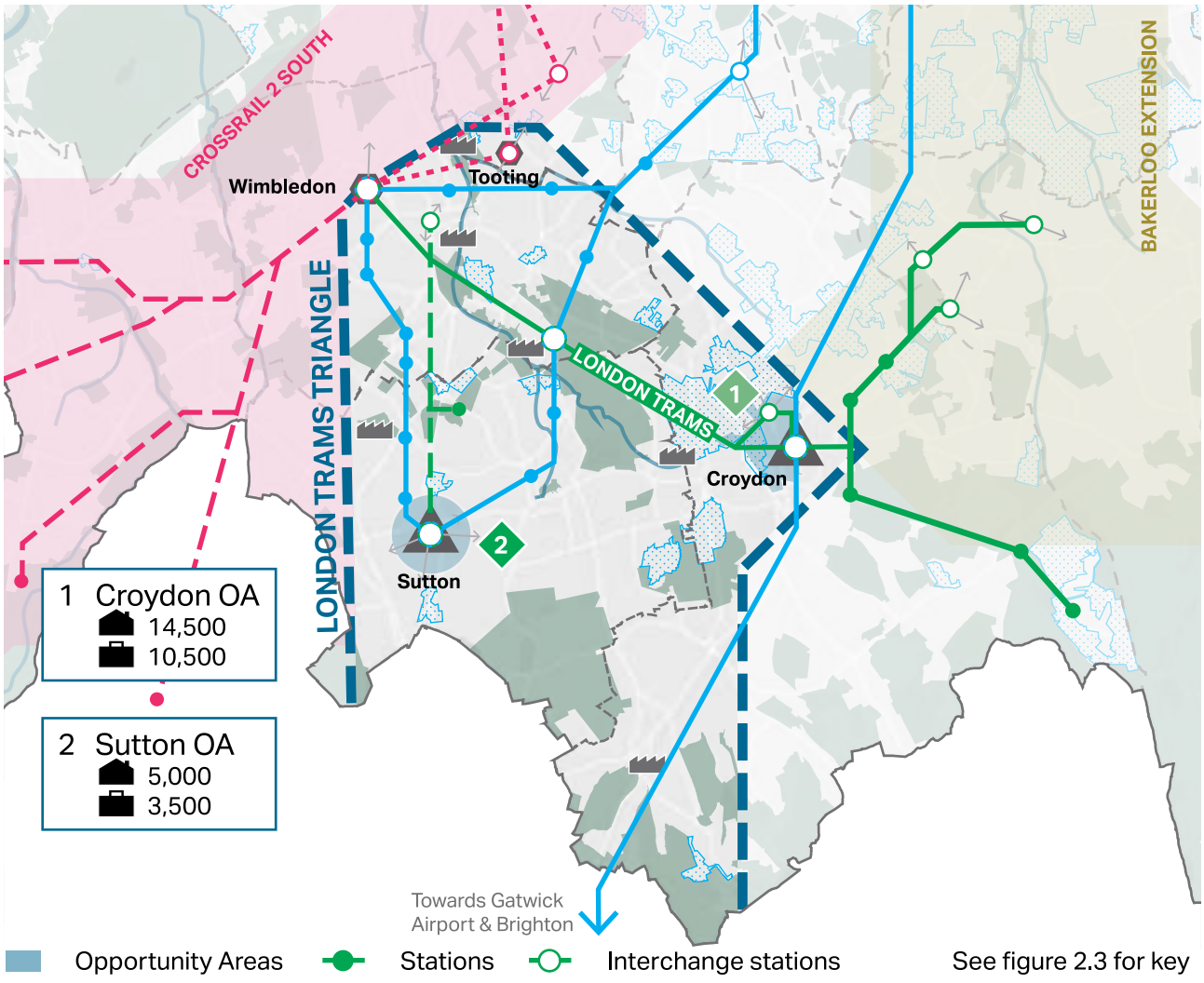
Trams Triangle/London-Gatwick-Brighton mainline

2.1.72 This area of South London contains the key town centres of Croydon, Sutton and Wimbledon, with important links to central London and Gatwick via the Brighton mainline and, in the future, Crossrail 2. The Tram has transformed travel opportunities in the area and provides the potential for further growth in homes and jobs. The proposal to extend the Tram to Sutton Town Centre, and potentially beyond to the proposed Cancer Hub, would improve public transport accessibility to the town centre and St. Helier Hospital, and support the delivery of at least 10,000 homes. TfL and the GLA are working with the boroughs to produce a robust business case and funding package, demonstrating how housing and employment growth can be unlocked.

2.1.73 This corridor links beyond London's boundaries into a Strategic Infrastructure Priority (see Figure 2.15 (9)).

Figure 2.12 - Trams Triangle



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Policy SD2 Collaboration in the Wider South East

A The Mayor will work with partners across the Wider South East (WSE) to address appropriate regional and sub-regional challenges and opportunities through recently-developed strategic coordination arrangements.

B To secure an effective and consistent strategic understanding of the demographic, economic, environmental and transport issues facing the WSE, the Mayor supports joint working with WSE partners to ensure that plan-making is, as far as possible, informed by up-to-date, consistent technical evidence and monitoring.

C The Mayor will take account of the views of WSE partners in discharging his Duties to Inform and Consult with authorities beyond London and will respond to their Duty to Co-operate requests for views on Development Plans insofar as they bear strategically on London.

D The Mayor supports recognition of long-term trends in migration in the development of Local Plans outside London.

E The Mayor will work with WSE partners to find solutions to shared strategic concerns such as: barriers to housing and infrastructure delivery (including 'smart' solutions – see also paragraph 9.6.9); factors that influence economic prosperity; the need to tackle climate change (including water management and flood risk); improvements to the environment (including air quality, biodiversity and green infrastructure), waste management, and the promotion of Circular Economies; wider needs for freight, logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual benefits can be achieved.

2.2.1 London is not an island. There are 130 authorities in the WSE outside London. Though it is significantly larger than other centres in the Wider South East, London is part of an **extensive and complex network of centres** of different sizes and functions. Some are of considerable strategic importance in their own right and the focus of their own sub-regional networks of centres. The network as a whole, and the orbital and radial linkages, which hold it together, comprise the most productive region in the UK accounting for nearly half its output and making by far the biggest net contribution to the national exchequer.

2.2.2 The WSE is home to 24.2 million people (8.9 million in London), 10.0 million households (3.6 million in London) and 13.7 million jobs (5.7 million in London).

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It is projected to **grow more rapidly** by 2041 than other parts of the UK – in population terms by 21 per cent in London and 17 per cent in the WSE outside London. Household numbers are expected to increase by 32 per cent in London and 23 per cent elsewhere in the WSE.

2.2.3 Both London and the rest of the WSE benefit from this regional dynamism. The effects of London's housing and labour markets and their related **multiplier effects** extend far beyond its administrative boundaries. 800,000 commuters travel into London each day (more than half of the workforce in some of the local authorities bordering London – see Figure 2.13) and make an important contribution to its economy as well as to the commuters' own local economies when they return home. Figure 2.14 illustrate trends in migration flows into and out of London.

2.2.4 There are mutual benefits for authorities across the WSE in working together to tackle these regionally important matters. Historically, a formal regional structure was in place to coordinate approaches to them. A non-statutory **strategic structure** has now been put in its place to address them,[6] facilitated by South East England Councils, the East of England Local Government Association, London Councils and the Mayor.

2.2.5 The new structure provides the basis for coordinated approaches to Government on pan-regional, general issues referred to in Part E of the policy. Opportunities to collaborate should be considered where **mutual benefits** can be achieved. The scope of these opportunities may vary depending on circumstances including proximity to London. The promotion of good links to/from potential employment locations outside London by the Mayor to help realise corresponding employment opportunities within and outside London is an example of how mutual benefits can be achieved. The Golden Triangle (life science sector collaboration with Oxford and Cambridge) and the Thames Estuary Production Corridor (delivering large-scale cultural infrastructure) are good examples of collaboration that is already underway.

2.2.6 This non-statutory structure for collaboration that is in place complements the GLA Act requirement for the spatial development strategy to address matters of strategic importance to Greater London (GLA Act, VIII, S.334 (5)) and the **Mayor's statutory Duties to Inform and Consult** (GLA Act, VIII, S.335 'with adjoining counties and districts', S.339 'authorities outside London', S.348 'authorities in the vicinity of London').

6 http://www.london.gov.uk/about-us/organisations-we-work/policy-and-infrastructure-collaboration-across-wider-south-east

2.2.7 Authorities outside London have a similar **Duty to Co-operate** (Localism Act 2011) with the Mayor on relevant matters of strategic importance as part of the process of preparing their Local Plans. In addition, Planning Practice Guidance[7] states that 'cooperation between the Mayor, boroughs and local planning authorities bordering London will be vital to ensure that important strategic issues, such as housing delivery and economic growth, are planned effectively'. The Mayor will share his responses to Local Plans outside the capital with interested London boroughs.

2.2.8 The Mayor supports and encourages collaborative regional working through his planning activities. However, locally-specific **cross-border matters** between individual London boroughs and authorities beyond London should be addressed most effectively by the relevant local authorities on the basis of their Duties to Cooperate.

2.2.9 To inform local housing need assessments the GLA has prepared authoritative and consistent **demographic projections** across the whole of the UK, which take into account the significant short-term, cyclical changes in migration flows from London. Partners are also exploring the scope to collate other consistent regional datasets.

7 NPPG – Paragraph: 007 'Duty to Cooperate', DCLG, 6 March 2014

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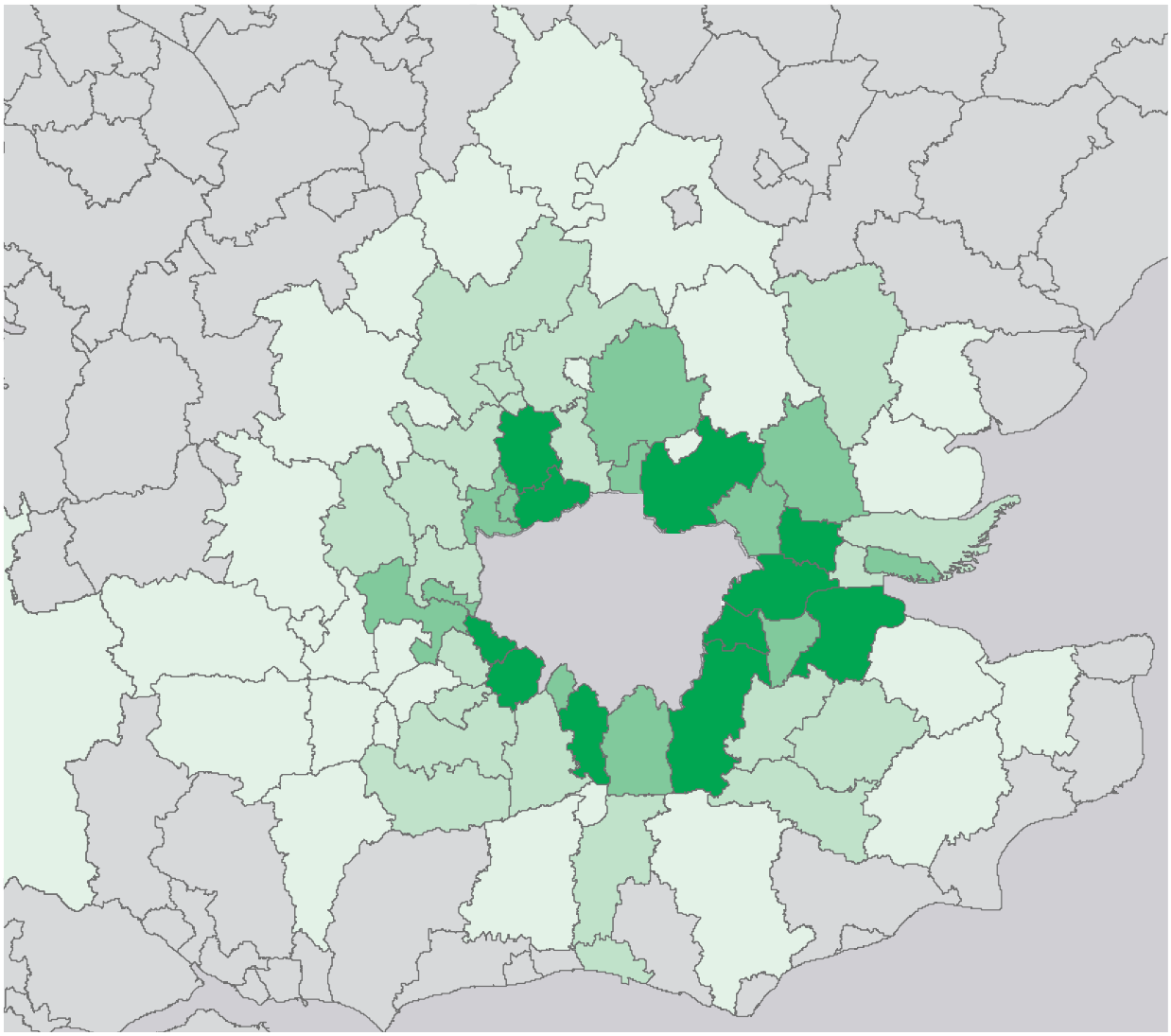
Figure 2.13 - Spatial Distribution of Commuting to London



Commuting flows from districts in England and Wales to London in 2011

- Less than 2,700
- 2,700 - 6,100
- 6,100 - 10,300
- 10,300 - 15,900
- Greater than 15,900

Clockwise from top left St. Albans; Hertsmere; Epping Forest; Basildon; Thurrock; Dartford; Medway; Sevenoaks; Reigate and Banstead; Elmbridge; Spelthorne.

Source: 2011 Census

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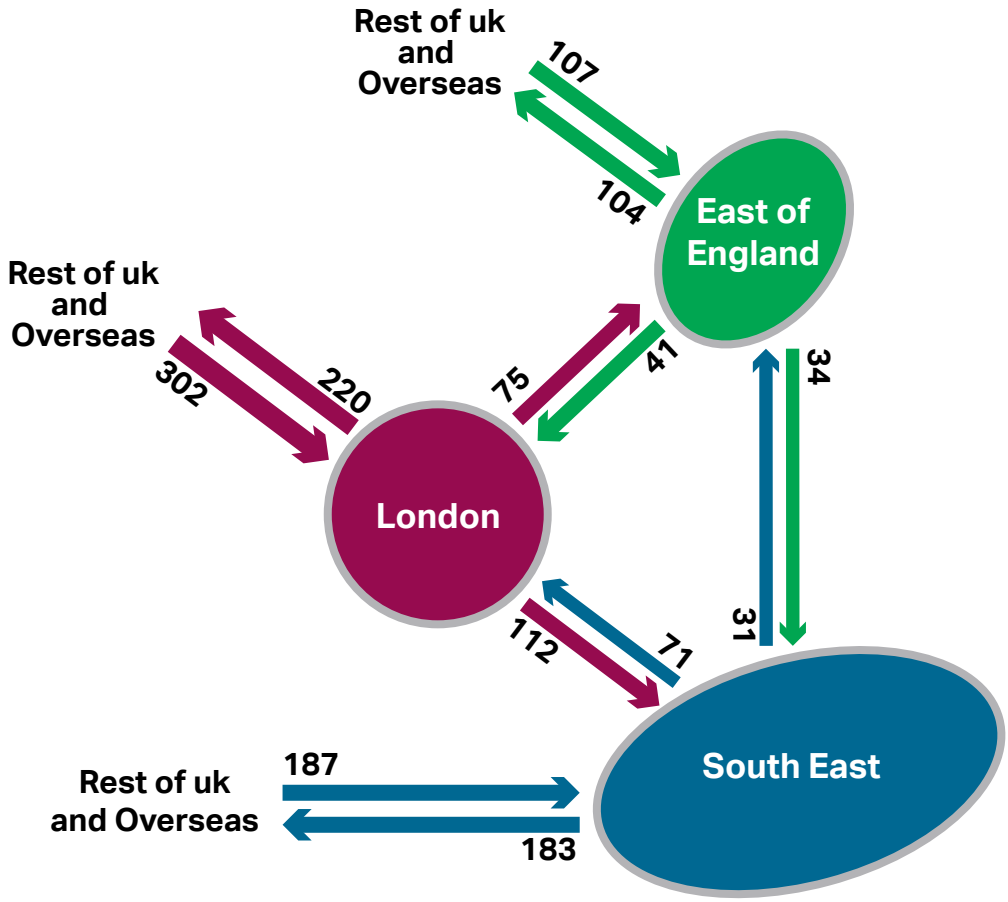
Figure 2.14 - Average annual gross migration flows 2016 – 2041



Source: GLA, 2016-based central projections - population in thousand

Policy SD3 Growth locations in the Wider South East and beyond

A The Mayor will work with strategic and local authorities, Government and other interested partners to realise the growth potential of the WSE and beyond through investment in strategic infrastructure to support housing and business development in particular in growth locations to meet need and secure mutual benefits for London and relevant partners.

B The Mayor supports recognition of these growth locations with links to London in relevant Local Plans outside London.

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2.3.1 This Plan aims to accommodate the majority of **London's growth** within its boundaries without intruding on its Green Belt or other protected open spaces. As with any successful urban area, this does not mean that in- and out-migration will cease, but that as far as possible sufficient provision will be made to **accommodate the projected growth within London**.

2.3.2 To ensure a **common understanding of growth projections** across the wider region the GLA will provide regionally-consistent demographic data, which takes into account long-term trends, and the Mayor will refer to this data as part of his representations on emerging Local Plans.

2.3.3 The GLA's new **Strategic Housing Market Assessment** shows that London has a need for approximately 66,000 additional homes a year. The Plan's housing target of approximately 520,000 homes over ten years is based on the findings of the new Strategic Housing Land Availability Assessment and informed by the Examination in Public process.

2.3.4 Although this Plan is seeking to accommodate the majority of London's future growth within its boundary, given the pressure for growth in both London and the WSE, the barriers to housing delivery that need to be overcome to avoid a further increase of the backlog, and potential changes to projections over time, it is prudent to also plan for longer-term contingencies. Therefore, the Mayor is interested in **working with willing partners** beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital.

2.3.5 This **partnership work** could help deliver more homes, address housing affordability and improve economic opportunities outside London. The focus is on locations that are (or are planned to be) well-connected by public transport and where development can help meet local growth aspirations as well as wider requirements. Recognising that investment in public transport can often bring significant benefits to wider areas, such partnerships could focus on optimising rail capacity between London, the wider region and beyond. Crossrail 2 and HS2 are examples with such potential. Another area of focus could be proposals for new/garden settlements with good links to London. Government has already indicated support for a similar approach.[8] The Mayor will seek to investigate and secure mutually beneficial infrastructure funding to unlock these opportunities.

2.3.6 Collaboration with willing partners can help alleviate some of the pressure on London while achieving local ambitions in the WSE for growth and development, recognising that this may require further infrastructure. The Mayor will work with **willing partners**, including local authorities, Local Enterprise Partnerships,

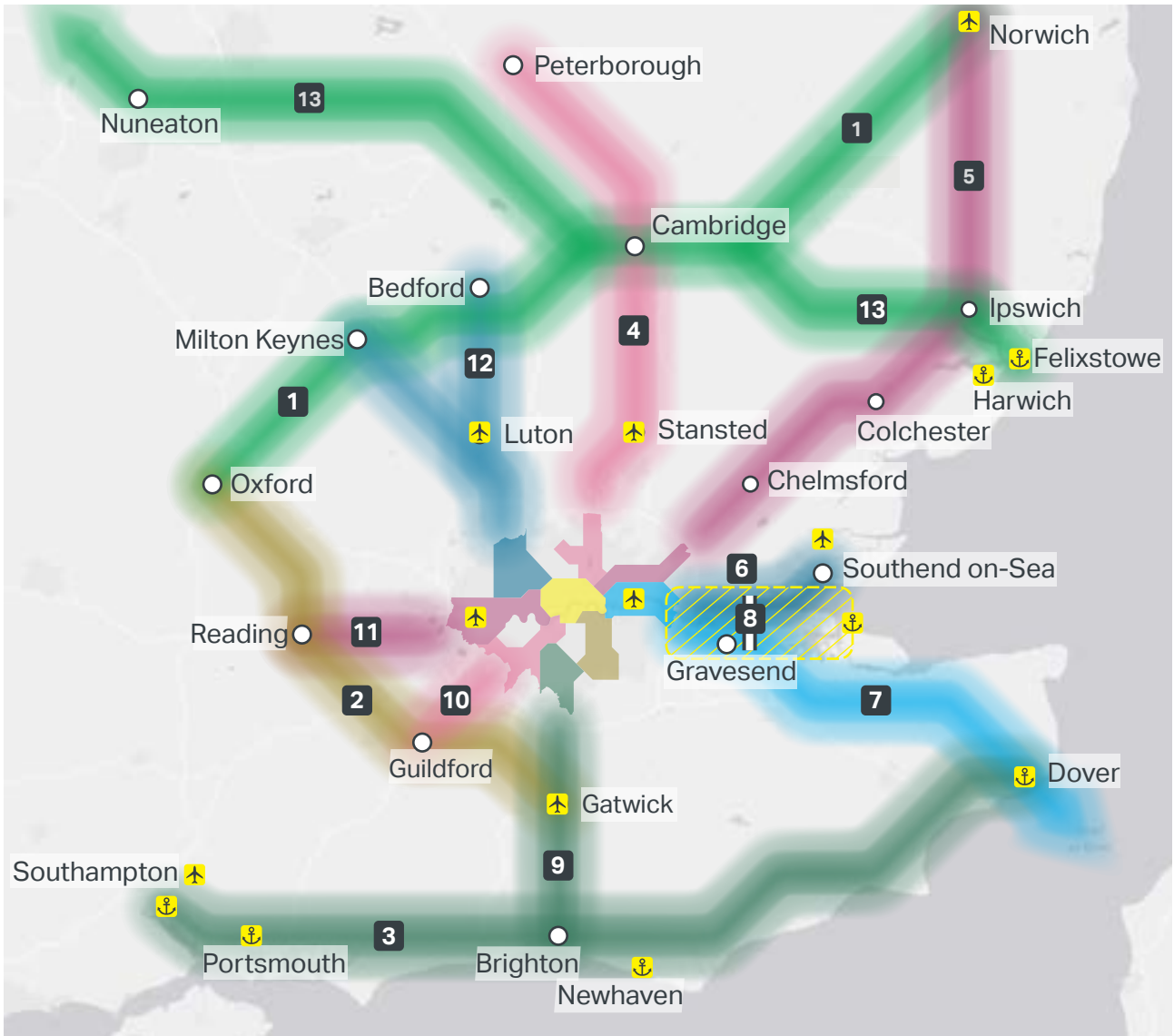
8 Locally-led Garden Villages, Towns and Cities, DCLG, March 2016

Sub-national Transport Bodies, the National Infrastructure Commission and Government, to explore strategic growth opportunities where planning and delivery of strategic infrastructure (in particular public transport) improvements can unlock development that supports the wider city region.

2.3.7 It will be important to ensure that growth in the WSE contributes to local vibrancy and economic activity at all times of the day and week, and that the scale of planned growth is proportional to public transport capacity in the area. Where appropriate, the Mayor will respond to Local Plans outside London and support Memoranda of Understanding or other mechanisms to formalise **partnership agreements** / commitments between relevant authorities. Work with some individual authorities and groups of authorities in the WSE has been initiated and is being pursued further. The Mayor continues to encourage authorities outside London to become willing partners and work with the capital on opportunities for growth, where mutual interest can be achieved.

2.3.8 Figure 2.15 shows London in its wider regional setting. 13 WSE **Strategic Infrastructure Priorities** have been endorsed by the WSE partners for initial delivery. Eight of these are radial priorities that connect directly to Growth Corridors within London. The remaining five are orbital priorities that can help reduce transit through London and stimulate the WSE economy beyond the capital. The schemes within these areas are at different planning stages. Their delivery will have to be phased. As all of these initial priorities are focused on transport, those schemes that can be linked to London's public transport system are also reflected in Table 10.1 (Chapter 10).

Figure 2.15 - Wider South East – 13 Initial Strategic Infrastructure priorities



Strategic Infrastructure Priorities

- Airport
- Port
- Thames Estuary Ports
- London Growth Areas

Source: Wider South East Partnership

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Strategic Infrastructure Priorities

1. East West Rail and new Expressway road link (Oxford - Cambridge)
2. North Down Rail Link (Gatwick - Reading) including extension to Oxford
3. A27 / M27 / A259 and rail corridor (Dover - Southampton)
4. West Anglia Mainline, Crossrail 2 North (London - Stansted - Cambridge - Peterborough) and M11
5. Great Eastern Mainline (London - Ipswich - Norwich) and A12
6. Essex Thameside, A217 and A13 corridor
7. Thames Gateway Kent : Elizabeth Line Extension and HS1 (London - North Kent - Channel Tunnel)
8. Lower Thames Crossing
9. Brighton Mainline (London - Gatwick - Brighton)
10. South West Mainline, Crossrail 2 South West (London - Surrey / Southern Rail Access to Heathrow) and A3
11. Great Western Mainline (London - Reading / Western Rail Access to Heathrow)
12. Midlands and West Coast Mainline (London - Luton - Bedford / Milton Keynes)
13. Felixstowe - Nuneaton / Midlands and A14

Policy SD4 The Central Activities Zone (CAZ)

A The unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced.

B The nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values.

C The distinct environment and heritage of the CAZ should be sustained and enhanced.

D Taking account of the dense nature of the CAZ, practical measures should be taken to improve air quality, using an air quality positive approach where possible (Policy SI 1 Improving air quality) and to address issues related to climate change and the urban heat island effect.

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E The unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions should be promoted and enhanced.

F The vitality, viability, adaptation and diversification of the international shopping and leisure destinations of the West End (including Oxford Street, Regent Street, Bond Street and the wider West End Retail and Leisure Special Policy Area) and Knightsbridge together with other CAZ retail clusters including locally-oriented retail and related uses should be supported.

G The CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted.

H The attractiveness and inclusiveness of the CAZ to residents, visitors and businesses should be enhanced, including through public realm improvements and the reduction of traffic dominance, as part of the Healthy Streets Approach (see Policy T2 Healthy Streets).

I Infrastructure to sustain and enhance the CAZ and its agglomeration of strategic functions including its public transport and digital connectivity and its potential to accommodate new development should be secured.

J The safety, security and resilience of the CAZ should be promoted working with businesses and communities.

K The quality and character of predominantly residential neighbourhoods, where more local uses predominate, should be conserved and enhanced.

L Development of social infrastructure that meets the distinct needs of the CAZ should be supported.

M Sufficient capacity for industry and logistics should be identified and protected, including last mile distribution, freight consolidation and other related service functions within or close to the CAZ and Northern Isle of Dogs to support the needs of businesses and activities within these areas.

N In Development Plans, boroughs should:

1) define the detailed boundaries of the CAZ, the Northern Isle of Dogs, town centres (including the International centres), CAZ retail clusters, Special Policy Areas and specialist clusters of strategic functions having regard to the CAZ Diagram shown in Figure 2.16
2) develop locally sensitive policies to meet this Plan's objectives for the CAZ

2.4.1 The CAZ is the vibrant heart and globally-iconic core of London. It is **one of the world's most attractive and competitive business locations**. It accommodates one third of London's jobs and generates almost 10 per cent of the UK's output. It contains the seat of national Government and is internationally renowned for its culture, night-time economy, tourism, shopping and heritage. It is also home to more than 230,000 residents.

2.4.2 The density, scale and mix of business functions and activities in the CAZ are unique and are underpinned by the connectivity provided by public transport, walking and cycling networks. This agglomeration results in exceptional levels of productivity, which is not replicated elsewhere in the UK, and provides national benefits. It **requires different or tailored approaches** to the application of national policy to address its distinct circumstances.

2.4.3 For the purposes of CAZ policies, the Northern Isle of Dogs (NIOD) is recognised as a CAZ '**satellite**'[9] **location** for world city office functions. Future potential reserve[10] locations for CAZ office functions are Stratford and Old Oak Common.

2.4.4 The **strategic functions** of the CAZ include, but are not necessarily limited to:

a. functions associated with the State, Government and Monarchy
b. diplomatic organisations (such as embassies and high commissions)
c. agglomerations of nationally and internationally significant offices and company headquarters connected with finance, business, professional bodies, associations and institutions
d. uses connected with science, technology, media, communications and cultural sectors of regional, national and international importance
e. centres of excellence for higher and further education and research
f. centres of medical excellence and associated specialist facilities
g. legal establishments of regional, national and international importance
h. arts, culture, leisure, entertainment and activities and areas of regional, national and international importance

9 The term 'satellite' is used to indicate that the NIOD is geographically separate from the CAZ but it is treated as part of the CAZ in London Plan policy.

10 These locations are not formally within the CAZ and are identified as future strategic reserves for nationally significant office functions in the event that future demand for office space exceeds development capacity in the CAZ. Specific policy directions for Stratford and Old Oak Common are contained within supporting text to Policy SD1 Opportunity Areas) and Annex 1 (Town Centre Network)

i. retailing, including specialist outlets, of regional, national and international importance

j. tourism facilities including hotels and conference centres

k. specialist creative clusters including for example clothing, fashion, jewellery, printing, antiques, musical instruments, art and culture

l. transport facilities, especially for public transport of regional, national and international importance

m. places of worship and places of assembly of regional, national and international importance

n. use and enjoyment of the River Thames

o. heritage, built environment, the Royal Parks and other green and open spaces (public and private).

2.4.5 Development Plans should set out the appropriate balance between the various CAZ strategic functions in different parts of the CAZ having regard to local circumstances.

2.4.6 The CAZ contains housing, social infrastructure and community uses to address the needs of residents, visitors and workers. Whilst they are not strategic functions of the CAZ, these **locally orientated uses** play an important role in the character and function of the Zone as a vibrant mixed-use area, ensuring activity and vitality at different times of the day and week. New residential development should be complementary and not compromise the strategic functions of the CAZ.

2.4.7 The **City of London** and the **Northern Isle of Dogs** are nationally important locations for globally-oriented financial and business services. The **West End** is a vibrant mixed-use business location, an internationally-renowned shopping, cultural and visitor destination and home to several world-leading academic institutions as well as a significant residential population. The unique roles of these locations and their strategic contribution to the economy, culture and identity of the capital should be promoted and enhanced.

2.4.8 As a whole, the CAZ supports a nationally and internationally significant scale and **agglomeration of offices**, enabled by the hyper-connectivity of its public transport infrastructure. The CAZ has important clusters in areas such as tech, the creative industries and life sciences,[11] adding to its strengths in the business, professional and financial services sector, arts and culture, health, education and law. A supportive policy approach to the wide variety of business

[11] London Office Policy Review, Ramidus Consulting, 2017

space requirements, quality and range of rental values is essential to enable these sectors to flourish and for small and medium-sized enterprises to fulfil their economic potential alongside larger businesses.[12]

2.4.9 The distinct **environment and heritage** of the CAZ should be sustained and enhanced through development decisions, Local Plans and other initiatives[13] such as the transformation of the Oxford Street district (including pedestrianisation of Oxford Street itself). This should recognise both its strategic elements, including the River Thames, the Royal Parks, World Heritage Sites, Designated Views and unique concentration of heritage assets, as well as more local features including the public realm, smaller waterways and green and open spaces.

2.4.10 **Air quality** in the CAZ is particularly poor due to the intensity of the road network and land uses. The CAZ also experiences high levels of construction which results in dust and emissions from construction activities and equipment that adversely affect air quality. The Mayor is taking practical steps to improve air quality in the CAZ including the T-charge and stricter Ultra-Low Emission Zone which will impose charges on the most polluting vehicles.[14]

2.4.11 **Arts, culture, tourism and entertainment activities** are a defining feature of the vibrant and distinctive character of the CAZ with its varied mix of daytime, evening and night-time uses. Together they make a vital contribution to London's culture and heritage, ensuring the capital is an attractive place in which to live, work, visit and invest. The CAZ includes several areas that are rich in cultural activity including the West End, South Bank/Bankside/London Bridge, the Barbican, King's Cross and the South Kensington museums complex, along with more local clusters and cultural venues. It also contains the country's largest concentrations of night-time activity in Soho, Covent Garden and Shoreditch. These areas and functions should be recognised, nurtured and supported in line with CAZ Policy and other policies related to culture and supporting the evening and night-time economy. Policies on hotels and other serviced accommodation in the CAZ (and elsewhere) are set out in the Economy chapter of this Plan.

2.4.12 The CAZ contains a vibrant, successful and diverse retail offer at a scale and quality that makes it a **shopping destination** of global significance. It contains a range of unique centres and mixed-use clusters with a predominant retail

12 Small Offices and Mixed Use Development in the CAZ, Ramidus Consulting, 2015

13 Mayor's Environment Strategy 2018

14 Details on the TfL website: https://tfl.gov.uk/modes/driving/emissions-surcharge, https://tfl.gov.uk/modes/driving/ultra-low-emission-zone; See also the Mayor's Environment Strategy 2018

function which perform different roles in the wider London Plan town centre network (see Policy SD8 Town centre network) including:

a. International centres – The West End (including the primary retail functions of Oxford Street, Regent Street, Bond Street and the wider West End Retail and Leisure Special Policy Area) and Knightsbridge

b. The West End Retail and Leisure Special Policy Area (WERLSPA) – including Covent Garden and Soho, where retail should complement the strategic cultural, leisure, evening and night-time economy roles of these areas

c. CAZ retail clusters – significant mixed-use clusters with a predominant retail function and in terms of scale broadly comparable to Major or District centres in the London Plan town centre network (see Annex 1)

d. Locally identified CAZ retail centres – smaller clusters or parades of retail and related uses broadly comparable to local/neighbourhood centres in the London Plan town centre network and generally serving very localised areas

e. Specialist retail destinations / clusters – including for example Covent Garden, arcades, street markets, covered and specialist markets, niche retailing, and retail and related facilities that serve specific communities (see Policy E9 Retail, markets and hot food takeaways)

f. Other retail clusters including areas within the CAZ – defined in Local Plans as being appropriate for retail development and ancillary clusters of retail associated with public transport termini and stations.

2.4.13 Wider trends in consumer expenditure and the emergence of **multi-channel retailing** present both challenges and opportunities for retailing within the CAZ. Overall, the CAZ is projected to have demand for approximately 375,000 sqm of additional comparison goods retail floorspace over the period 2016-2041[15] (after the committed pipeline of retail development is taken into account). Within this context the vitality and viability of the international shopping centres and other CAZ retail clusters above should be enhanced, supporting their adaptation and diversification, along with improvements to the quality of the environment and public realm.

2.4.14 The CAZ contains several other important **specialist clusters of activity** which contribute towards the capital's international and national roles. These clusters contain significant concentrations of strategic functions of arts and culture, state, health, law and education and are represented spatially in the CAZ Diagram (Figure 2.16). Many of these clusters have developed organically over

15 Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, Experian, 2017

time and the dynamic nature of the CAZ means that this process is continually evolving. It will be important to promote and sustain certain clusters such as Tech City; the arts, cultural and creative clusters in Soho/West End, Barbican/ Smithfield/ Farringdon, Shoreditch, South Kensington museums complex, King's Cross, Angel and London Bridge/Southbank; and the centres of medical excellence and life sciences research clusters around the Euston Road including the University College Hospital, the Wellcome Trust and the Francis Crick Institute (and on the CAZ fringe[16] at Whitechapel and White City).

2.4.15 **Special Policy Areas** are supported, particularly where development pressures and market conditions could lead to the loss of valued specialist clusters of uses or functions identified as having particular significance to London's unique identity, economic function or cultural heritage. Examples include St James's (art and antiques), Savile Row (bespoke tailoring), Denmark Street (musical instrument retail) and Hatton Garden (jewellery). Given the operation of the Use Classes Order and permitted development rights, Special Policy Areas often require the collaboration of landowners to achieve their objectives.

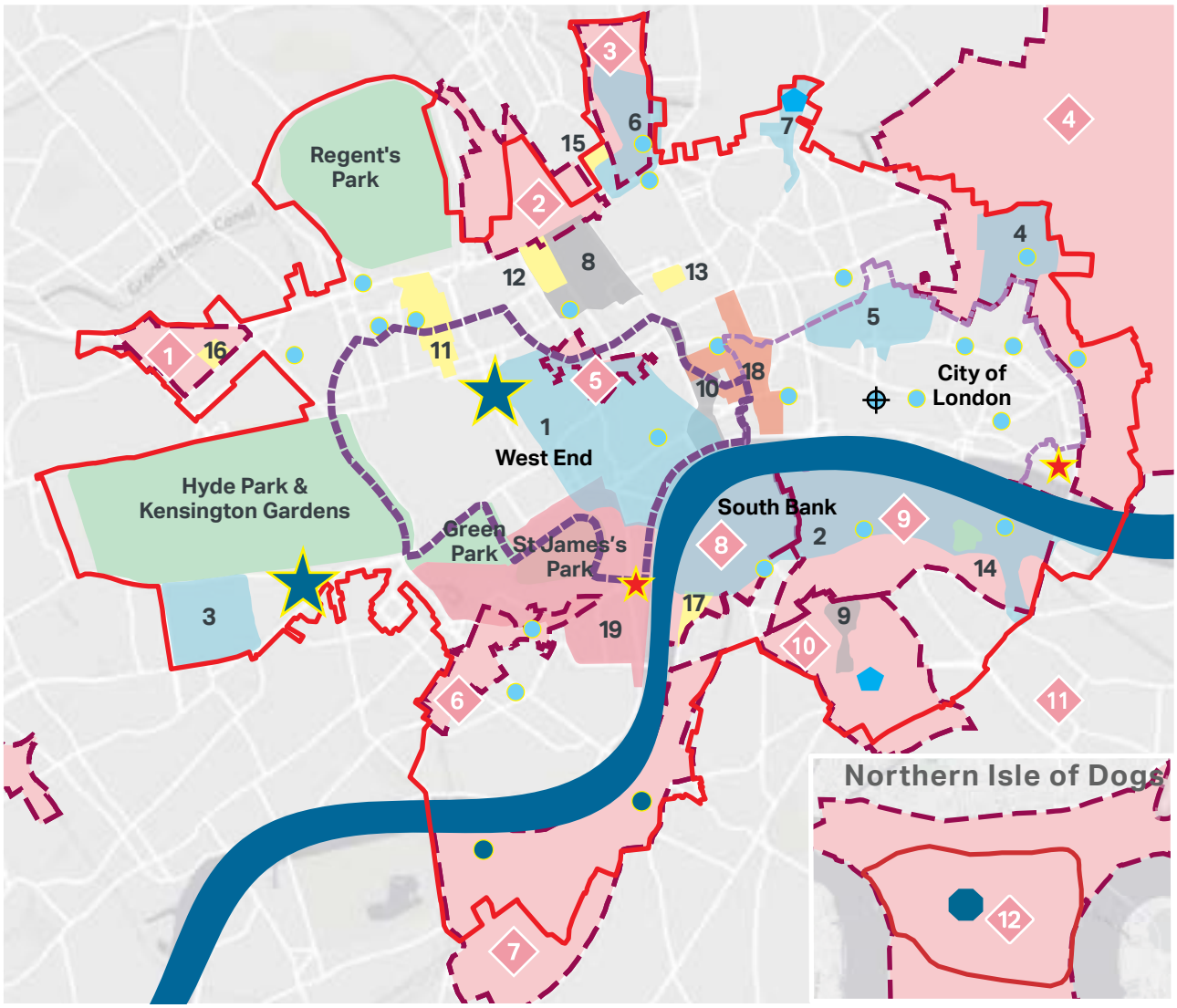
2.4.16 The CAZ is one of the most connected places in the world. Crossrail and the Thameslink programme will significantly increase the number of people within 45 minutes' travel time of central London, improving access to the labour market and the competitiveness of businesses. Further investment in strategic **transport infrastructure** and capacity improvements are necessary to support the growth and success of the CAZ, in particular Crossrail 2.

2.4.17 **Digital connectivity** and associated infrastructure is a key consideration in the CAZ where densities of commercial development in particular are high. Where necessary, development proposals should seek to aggregate demand in areas not currently served by high-speed connectivity and liaise jointly with providers to ensure that infrastructure requirements can be planned and delivered appropriately (see Policy SI 6 Digital connectivity infrastructure).

2.4.18 Local Plans and development proposals should respond to issues related to climate change taking into account the distinct circumstances of the CAZ including the **urban heat island effect** (whereby the CAZ suffers from higher local temperatures than surrounding parts of London) and its vulnerability to **flooding** due to low-lying land and the high proportion of impermeable surfaces.

16 The CAZ fringe refers to areas that have a functional relationship with the CAZ and lie within reasonable proximity to the CAZ but do not lie within the Zone itself

Figure 2.16 - CAZ Diagram



The Central Activities Zone and the Northern Isle of Dogs

- CAZ and NIOD
- St Paul's Cathedral
- World Heritage Site
- Royal Parks
- City of London
- West End
- River Thames
- Opportunity Area

Specialist Clusters

- Academic
- Arts, culture and entertainment
- Health
- Legal
- State

Source: GLA Planning

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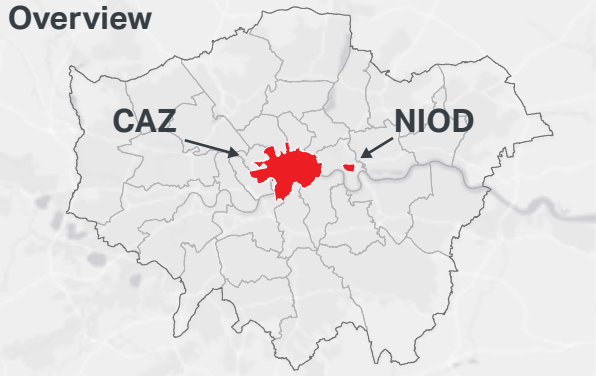
Retail Clusters and Town Centres

- International
- Metropolitan
- Major
- CAZ retail cluster
- Potential CAZ retail cluster



Specialist Clusters

1. West End (including Soho / Covent Garden)
2. South Bank, Bankside and London Bridge
3. Royal Albert Hall / South Kensington Museums
4. Shoreditch
5. Barbican / Smithfield / Farringdon
6. King's Cross
7. Angel / Sadler's Wells
8. University College London / University of London
9. Southbank University
10. LSE / King's College London
11. Harley Street
12. University College Hospital
13. Great Ormond Street Hospital
14. King's College London Guy's Campus
15. Francis Crick Institute
16. St Mary's Hospital cluster
17. St Thomas' Hospital
18. Temple, Royal Courts of Justice, Inns of Court
19. Royal Palaces, Palace of Westminster and Whitehall

Opportunity Areas

1. Paddington
2. Euston
3. King's Cross
4. City Fringe / Tech City
5. Tottenham Court Road
6. Victoria
7. Vauxhall, Nine Elms and Battersea
8. Waterloo
9. London Bridge Bankside
10. Elephant and Castle
11. Old Kent Road
12. Isle of Dogs

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2.4.19 The quality and character of the CAZ's **predominantly residential neighbourhoods** should be conserved and enhanced. This should ensure a variety of housing suitable to the needs of diverse communities, including affordable housing, whilst ensuring that development does not compromise strategic CAZ functions. Boroughs should also consider **social infrastructure** demands generated by residents, workers and visitors in the CAZ when undertaking social infrastructure need assessments.

2.4.20 In the high-value land market within the CAZ there is very limited **industrial and logistics capacity**. Differentials between industrial and non-industrial land values in the CAZ boroughs put immense pressure on sites in industrial use for conversion to non-industrial uses.[17] In Development Plans and development decisions, boroughs (particularly but not exclusively those in CAZ and inner London) should take into account the supply and demand for industrial and related uses providing essential functions and services to the CAZ. These functions include: sustainable distribution and logistics; 'just-in-time' servicing such as food service activities, printing, administrative and support services, office supplies, repair and maintenance; construction; waste management and recycling; and land to support transport functions (see also Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL) and Policy E6 Locally Significant Industrial Sites).

Policy SD5 Offices, other strategic functions and residential development in the CAZ

A New residential development should not compromise the strategic functions of the CAZ.

B Residential development is not appropriate in defined parts of the City of London and Northern Isle of Dogs (areas to be identified by boroughs in Development Plans).

C Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in all other areas of the CAZ except:

17 London Industrial Land Supply and Economy Study, AECOM, 2016; London Industrial Land Demand Study, CAG Consultants, 2017

1) the Vauxhall, Nine Elms, Battersea and Elephant & Castle Opportunity Areas, where offices and other CAZ strategic functions are given equal weight relative to new residential; and

2) wholly residential streets or predominantly residential neighbourhoods (with exceptions in appropriate circumstances – for example clusters of specialist CAZ strategic functions, Special Policy Areas and CAZ retail clusters).

D In Development Plans, boroughs should develop local policies for the areas in parts B and C above and identify the areas in Part C.

E The Mayor will work with boroughs and support them to introduce Article 4 Directions to remove office to residential permitted development rights across the whole of the CAZ and the Northern Isle of Dogs (and those parts of Tech City and Kensington & Chelsea lying outside the CAZ).

F In areas where offices and other CAZ strategic functions are given greater or equal weight relative to new residential development (as defined in Part C), mixed-use office/residential proposals should be supported where there is an equivalent or net increase in office floorspace.

G Residential or mixed-use development proposals should not lead to a net loss of office floorspace in any part of the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices. To achieve this, alternative provision of equivalent or net additional office space can be made (including through swaps and credits – see Part H below). This should be within the CAZ and near the development.

H Local approaches to mixed-use development of offices with housing should sustain strategically-important clusters of commercial activities within the CAZ and consider the potential to use land use swaps, credits and off-site contributions.

2.5.1 The CAZ is an **internationally and nationally significant office location**, complemented by the Northern Isle of Dogs and Tech City.

2.5.2 Table 6.1 indicates that the CAZ and the Northern Isle of Dogs are projected to accommodate more than 367,000 additional office jobs and a net increase of 3.5 million sqm (GIA) of office floorspace over the period 2016-2041,[18] an average of 140,000 sqm per annum. The **provision of a range of office floorspace** in

[18] London Office Policy Review, Ramidus Consulting, 2017

terms of size, quality and cost should be supported through a combination of intensification, redevelopment and refurbishment whilst ensuring a suitable supply of secondary stock, which provides relatively affordable lower-cost market provision of business space (see Policy E2 Providing suitable business space and Policy E3 Affordable workspace).

2.5.3 Given their strategic importance, as a general principle, offices and other CAZ strategic functions are given greater weight relative to new residential development in the Zone (with exceptions set out in policy). The principle of greater weight is designed to ensure that the agglomerations of offices and other CAZ strategic functions are not compromised by new residential development. The principle should inform Local Plan preparation and development management. Residential development is considered inappropriate in defined parts of the **City of London and Northern Isle of Dogs** reflecting the prominent role of these locations in providing capacity for world city business functions. This policy will ensure that the current and future potential to assemble and deliver office development in these locations is not compromised by residential development.

2.5.4 The Opportunity Areas of **Vauxhall Nine Elms Battersea and Elephant & Castle** have potential to deliver greater levels of housing alongside employment than the other CAZ Opportunity Areas. In these areas, offices and other CAZ strategic functions may be given equal weight relative to new residential development.

2.5.5 Development Plans will play a key role in setting out detailed office policies for the CAZ and the appropriate balance between CAZ strategic functions (including offices) and residential in mixed-use areas and in identifying locations or sites where residential development is appropriate. Evidence required to demonstrate no reasonable prospect of a site being used for offices is set out in paragraph 6.1.7 of this Plan.

2.5.6 The Mayor supports a co-ordinated approach to the introduction of **Article 4 Directions** by the CAZ boroughs before the exemptions expire in May 2019 to ensure that London's nationally-significant offices in and around the CAZ are safeguarded. Boroughs are encouraged to draw on both strategic[19] and local evidence to support these Directions.

2.5.7 **Land use swaps and credits** can be used to support local balances between CAZ strategic functions and housing. A land use swap is where a developer provides an off-site office development to satisfy the requirements of Part H by a specified residential or mixed residential and commercial development.

19 London Office Policy Review, Ramidus Consulting, 2017; Small offices and mixed-use development in CAZ, Ramidus Consulting, 2015

The planning applications for the two sites are considered at the same time by the planning authority and are linked by a Section 106 agreement or planning condition. A land use credit is where new off-site office provision is provided in advance by a developer on the basis that it could be drawn down to satisfy the requirements of Part H by a specified residential or mixed residential and commercial development.

2.5.8 **Affordable housing** provision should be provided on-site as part of residential and mixed-use schemes in the CAZ (see Policy H4 Delivering affordable housing). In exceptional circumstances, off-site and cash in lieu contributions can be provided in line with Policy H4 Delivering affordable housing where this serves to sustain important clusters of commercial activities in the CAZ and Northern Isle of Dogs.

Policy SD6 Town centres and high streets

A The vitality and viability of London's varied town centres should be promoted and enhanced by:

1) encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses
2) identifying locations for mixed-use or housing-led intensification to optimise residential growth potential, securing a high-quality environment and complementing local character and heritage assets
3) delivering sustainable access to a competitive range of services and activities by walking, cycling and public transport
4) strengthening the role of town centres as a main focus for Londoners' sense of place and local identity in the capital
5) ensuring town centres are the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy
6) supporting the role of town centres in building sustainable, healthy and walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management.

B The adaptation and diversification of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.

C The potential for new housing within and on the edges of town centres should be realised through mixed-use or residential development that makes best use of land, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.

D The particular suitability of town centres to accommodate a diverse range of housing should be considered and encouraged, including smaller households, Build to Rent, older people's housing and student accommodation.

E The redevelopment, change of use and intensification of identified surplus office space to other uses including housing should be supported, taking into account the impact of office to residential permitted development rights (see Policy E1 Offices) and the need for affordable and suitable business space (Policy E2 Providing suitable business space, Policy E3 Affordable workspace).

F The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having regard to the role of individual centres in the night-time economy (see Figure 7.6 and Table A1.1) and supporting the development of cultural uses and activity.

G Tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted (see Policy E10 Visitor infrastructure).

H The delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with young children, should be provided. This may include Shopmobility schemes, the provision of suitably designed crossing points, dropped kerbs and tactile paving, seating and public toilets.

I The varied role of London's high streets should be supported and enhanced.

J The provision of social infrastructure should be enhanced, particularly where it is necessary to support identified need from town centre and local residents, and facilities should be located in places that maximise footfall to surrounding town centre uses.

K Safety and security should be improved, and active street frontages should be secured in new development, including where there are ground floor residential frontages.

2.6.1 London's **town centres are central to the lives of Londoners**. They provide a focus for the local community, both geographically and in relation to the sense of identity and broad mix of uses they provide. Policy SD6 Town centres and high streets does not apply to CAZ Retail Clusters or any town centres located wholly within the Central Activities Zone (CAZ).[20] The CAZ contains a rich mix of functions, including a substantial quantity and variety of main town centre uses, and will continue to play a crucial role in supporting London's growth. Policy SD4 The Central Activities Zone (CAZ) and Policy SD5 Offices, other strategic functions and residential development in the CAZ guide development of the CAZ and set out how the development of main town centre uses in the CAZ should be brought forward.

2.6.2 The spaces within and around town centres have an important public function, with high streets, public squares, markets, parks, gardens and other open spaces providing opportunities for people to gather, meet, socialise, and be entertained. Town centres are usually transport hubs, served by rail, tram and bus networks, and are accessible for people walking and cycling. Town centres and high streets have social value, providing access to a range of shops and services, employment opportunities, social contact, and information and support. The agglomeration of town centres gives rise to formal and informal networks of businesses, supply chains, customers, employees, institutions, and volunteers that can provide mutual support, advice and economic benefit. Many town centres in London are of historic interest and contain high concentrations of heritage assets.

2.6.3 **High streets** are one of London's most characteristic urban features which play an important role in terms of local economic and social infrastructure, providing employment opportunities and promoting community and cultural exchange. The character and function of high streets within town centres should be promoted and enhanced.

2.6.4 Over the years, town centres have absorbed change and new technologies. To continue to thrive they will need to evolve and diversify in response to current

20 Policy SD6 Town centres and high streets applies to the entirety of Angel town centre and Elephant and Castle town centre.

and future economic trends, technological advances, consumer behaviours, and the development of the 24-hour city. This **need for adaptation and diversification**, together with their good public transport accessibility, makes many town centres appropriate locations for residential-led intensification or mixed-use development that makes best use of land. Bringing new residents into town centres can enhance their commercial role, increasing footfall, particularly to support convenience retail, leisure uses and the evening and night-time economy. Town centres will also need to diversify the range of commercial uses, particularly smaller centres and those with projected decline in demand for retail floorspace. Boroughs and others should ensure their strategies, policies and decisions encourage a broad mix of uses while protecting core retail uses to meet demand.

2.6.5 Retailing has evolved to become multi-channel, with a mix of physical stores, 'click and collect' points, direct delivery to homes and workplaces, and showrooms for digital businesses. Overall, household expenditure on retail is projected to rise but this demand will be spread unevenly across London's town centres, reflecting **trends towards the polarisation of retail space** towards the larger and stronger centres in London.[21] Approximately 76 per cent of the gross comparison goods retail floorspace requirement is anticipated to be focused in the International, Metropolitan and Major town centres and CAZ retail clusters, with 11 per cent in District centres.[22] As many as 60 per cent of District centres in London are likely to have surplus comparison goods retail space over the Plan period.

2.6.6 These trends present significant **challenges and opportunities for retailing** in all town centres and associated high streets including adapting to new innovative forms of retailing, accommodating new space where there is identified demand, and managing the transition of surplus retail floorspace to other uses, such as leisure, business, and more intensive forms of mixed-use development that include a residential component, in appropriate locations. Boroughs and other stakeholders will need to proactively manage their town centres to take account of these trends and the impacts on centres of different types and sizes.

2.6.7 **Residential development** plays an important role in ensuring town centre vitality, particularly through the delivery of diverse housing. Residential-only schemes in town centres may be appropriate outside the primary shopping area

21 Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, Experian, 2017

22 Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, Experian, 2017

and primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable.

Policy SD7 Town centres: development principles and Development Plan Documents

A When considering development proposals, boroughs should take a town centres first approach, discouraging out-of-centre development of main town centre uses in accordance with Parts A1 - A3, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices). Boroughs should:

1) apply the sequential test to applications for main town centre uses, requiring them to be located in town centres. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge-of-centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport. Out-of-centre sites should only be considered if it is demonstrated that no suitable sites are (or are expected to become) available within town centre or edge of centre locations. Applications that fail the sequential test should be refused
2) require an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses that are not in accordance with the Development Plan. Applications that are likely to have a significant adverse impact should be refused
3) realise the full potential of existing out-of-centre retail and leisure parks to deliver housing intensification through redevelopment and ensure such locations become more sustainable in transport terms, by securing improvements to public transport, cycling and walking. This should not result in a net increase in retail or leisure floorspace in an out-of-centre location unless the proposal is in accordance with the Development Plan or can be justified through the sequential test and impact assessment requirements in Parts A(1) and A(2) above.

B Boroughs should support the town centres first approach in their Development Plans by:

1) assessing the need for main town centre uses, taking into account capacity and forecast future need
2) allocating sites to accommodate identified need within town centres, considering site suitability, availability and viability, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices). If suitable and viable town centre sites are not available, boroughs should allocate appropriate edge-of-centre sites that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport
3) reviewing town centre boundaries where necessary
4) setting out policies, boundaries and site allocations for future potential town centres to accommodate identified deficiencies in capacity (having regard to Policy SD8 Town centre network and the future potential town centre classifications in Annex 1).

C In Development Plans, boroughs should:

1) define the detailed boundary of town centres in policy maps including the overall extent of the town centre (taking into consideration associated high streets which have particular economic or social value) along with specific policy-related designations such as primary shopping areas, primary and secondary frontages and night-time economy in light of demand/capacity assessments for town centre uses and housing
2) consider the protection of out-of-centre high streets as local parades or business areas and develop appropriate policies to support and enhance the role of these high streets, subject to local evidence, recognising the capacity of low-density commercial sites, car parks and retail parks for housing intensification and mixed-use redevelopment (see Policy H1 Increasing housing supply)
3) develop policies through strategic and local partnership approaches (Policy SD9 Town centres: Local partnerships and implementation) to meet the objectives for town centres set out in Policy SD6 Town centres and high streets to support the development, intensification and enhancement of each centre, having regard to the current and potential future role of the centre in the network (Policy SD8 Town centre network

4) develop policies for edge-of-centre areas, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses taking into account local circumstances
5) identify centres that have particular scope to accommodate new commercial development and higher density housing, having regard to the growth potential indicators for individual centres in Annex 1. Criteria to consider in assessing the potential for intensification in town centres include:
    a) assessments of demand for retail, office and other commercial uses
    b) assessments of capacity for additional housing
    c) public transport accessibility and capacity
    d) planned or potential transport improvements – to indicate future capacity for intensification
    e) capacity and proximity of social infrastructure
    f) existing and potential level of density of development and activity
    g) relationship with wider regeneration initiatives
    h) vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre
    i) potential to complement local character, existing heritage assets and improve the quality of the town centre environment
    j) viability of development.
6) identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example:
    a) comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge-of-centre retail/leisure parks
    b) redevelopment of town centre shopping frontages that are surplus to demand
    c) redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing non-residential uses

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d) delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development.

7) support flexibility for temporary or 'meanwhile' uses of vacant properties.

D Development proposals should:

1) ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment

2) ensure that commercial space is appropriately located having regard to Part A and B above, and is fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing

3) support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents

4) support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.

2.7.1 The London Plan takes a strong **town centres first** approach, in order to make the most of the agglomeration benefits and accessibility of town centres and to ensure sustainable patterns of development. Out-of-centre development can be particularly detrimental to town centres, undermining their economic performance, local character, and the accessibility they provide to a broad range of services, and encouraging increased trips by car. In order to support the vitality of town centres, it is important to take a sequential approach, focusing on sites within town centres before considering edge-of-centre sites. This ensures that town centre uses are not unnecessarily dispersed, maximises the overall growth potential of town centres and promotes investment in high streets and primary shopping frontages.

2.7.2 Borough's local Development Plan Documents should proactively plan to meet forecast need for main town centre uses by allocating sites within or (where justified) on the edge of town centres and through town centre boundary reviews, in order to support the town centres first approach. Where town centre and edge of centre sites are not available, local Development Plan Documents should identify future potential town centres that could accommodate the forecast additional need, and set appropriate policies, boundaries and site

allocations for these areas (having regard to Policy SD8 Town centre network and the future potential town centre classifications in Annex 1). This approach will deliver a sustainable pattern of development by **focusing main town centre uses to existing town centres or through the creation of new centres**.

2.7.3 Policy SD7 Town centres: development principles and Development Plan Documents does not apply to **CAZ** Retail Clusters or any town centres located wholly within the Central Activities Zone.[23, 24]

2.7.4 Where **edge-of-centre developments of retail, leisure and office uses** are proposed, and are not in accordance with the Development Plan, these should be accompanied by a robust and detailed impact assessment. This applies to development greater than a locally set floorspace threshold, or 2,500 sqm if a local floorspace threshold has not been set. An impact assessment may also be required for developments below this threshold, for example where a borough has set a proportionate, local floorspace threshold. Impact assessment may also be required where a proposal is likely to give rise to development at a scale not related to the role and function of a centre, such as a large retail store in or on the edge of a neighbourhood or local centre. Assessments should consider the impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal, and the impact on town centre vitality and viability.

2.7.5 Existing out-of-centre and edge-of-centre retail and leisure parks are often low density and car dependent, and poorly integrated into the surrounding area. They usually suffer from an environment that creates barriers to cycling and walking, with extensive surface car parks and buildings that have large footprints and limited active frontages. Many of these places have significant potential to provide additional housing, improve the impact on the local environment, improve legibility, and become more sustainable in the modes of transport they enable and encourage. **Redevelopment of retail and leisure parks to deliver housing intensification** is encouraged, as set out in Policy H1 Increasing housing supply. This should not generally result in an increase of retail or leisure floorspace, taking account of the town centres first approach, the sequential approach to town centre uses, and impact assessments where appropriate. Some edge-of-centre retail parks may be appropriate for a wider range of employment uses, subject to sequential testing and impact assessment.

23 Policy SD7 Town centres: development principles and Development Plan Documents applies to the entirety of Angel town centre and Elephant and Castle town centre.

24 See paragraph 2.6.1 for further information.

2.7.6 It is important that boroughs **plan positively to meet the needs of their communities**. Being able to access convenience retail, specialist shops and services is important for supporting the daily lives of Londoners and for creating and sustaining strong and inclusive communities. Many town centres and high streets serve specific communities, for example they may provide specialist food or clothing that meet the cultural or religious needs of one or more particular group. Boroughs should use their evaluation of the area and engagement with local communities and stakeholders to draw up local Development Plan policies, designations and site allocations, and develop town centre strategies that seek to meet the needs of their communities.

2.7.7 The **location, design, type, and level of fit-out** of commercial uses, particularly those in mixed-use development, should support the town centres first approach and ensure that commercial premises make a positive contribution to the vitality of the area and are quickly occupied. Where commercial uses are appropriate, it is important that the units are prominently and accessibly situated and clustered together. They should have flexible layouts with few columns or risers, be of a suitable depth to be able to accommodate back-of-house functions, and have adequate floor-to-ceiling heights. Units should be weather-tight and partially fitted-out, such as with toilets, kitchenettes, heating and services, to make them commercially attractive to potential occupiers, before residential units are occupied. A range of unit sizes should be provided, to ensure that town centres can provide floorspace for both large and small occupiers, and to support the diversity, vitality and vibrancy of town centres.

Policy SD8 Town centre network

A The changing roles of town centres should be proactively managed in relation to the town centre network as a whole (see Figure 2.17 and Annex 1). This process should support sustainable economic growth across the Greater London boundary to enhance the vitality and viability of London's centres and complement those in the Wider South East.

B Identified deficiencies in the London town centre network can be addressed by promoting centres to function at a higher level in the network, designating new centres (see Annex 1) or reassessing town centre boundaries (see Policy SD7 Town centres: development principles and Development Plan Documents). Diversification in centres with current or projected declining demand for commercial, particularly retail, floorspace should be supported.

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These centres may be reclassified at a lower level in the hierarchy through a coordinated approach with local planning authorities.

C The classification of International, Metropolitan and Major town centres (see Annex 1) can only be changed through the London Plan. Potential future changes to the strategic town centre network are set out in Figure A1.1 in Annex 1. Changes to District, Local, Neighbourhood centres and CAZ Retail Clusters can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate (see Policy SD7 Town centres: development principles and Development Plan Documents).

D International, Metropolitan and Major town centres should be the focus for the majority of higher order comparison goods retailing, whilst securing opportunities for higher density employment, leisure and residential development in a high quality environment.

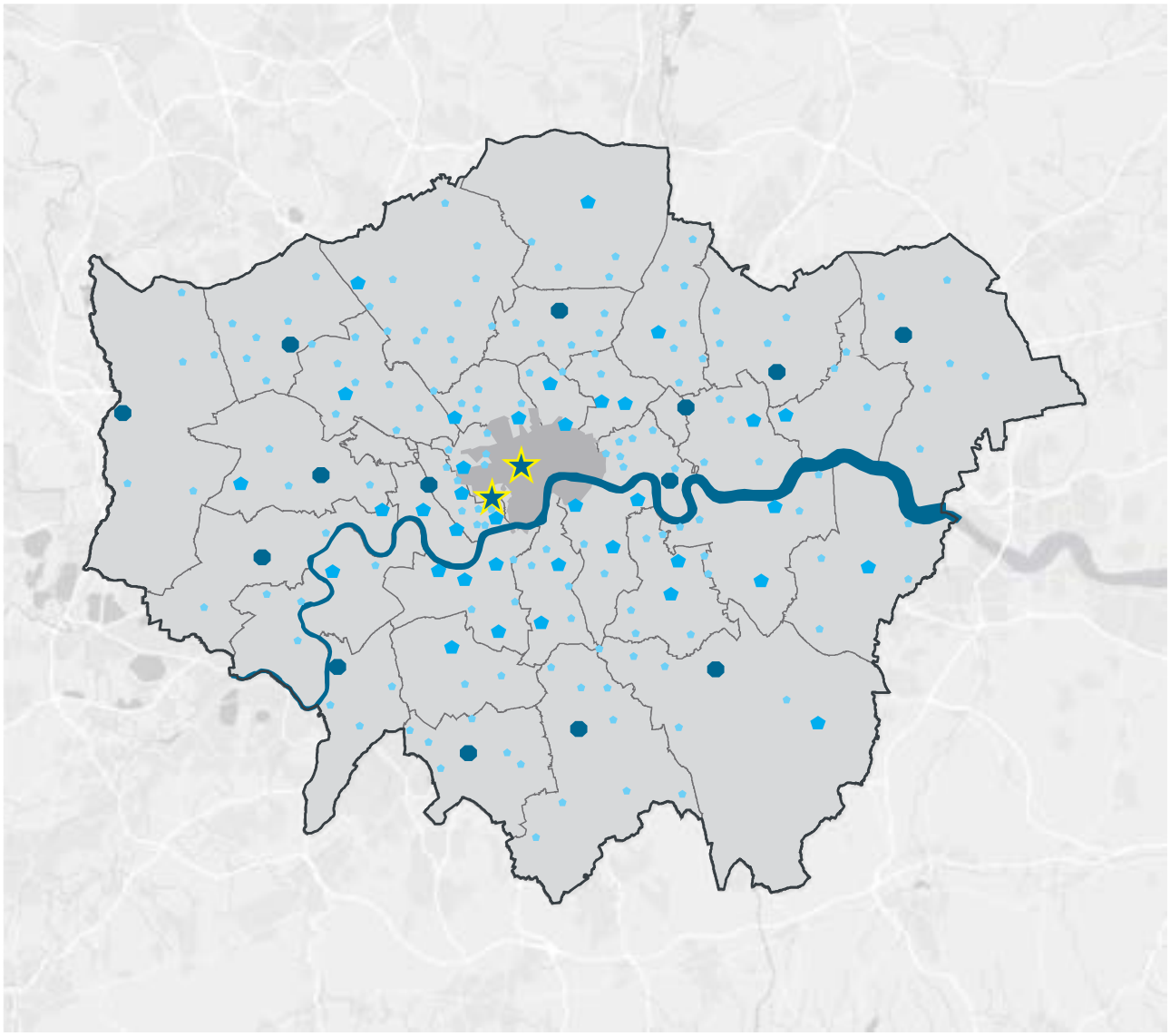
E District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, social infrastructure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use residential development and improvements to their environment.

F Local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis.

G Boroughs and other stakeholders should have regard to the broad policy guidelines for individual town centres in Annex 1 including:

1) indicative growth potential (commercial and residential)
2) centres associated with the Areas for Regeneration (see Policy SD10 Strategic and local regeneration)
3) night-time economy roles (see Policy HC6 Supporting the night-time economy)
4) viable office locations including those with strategic office development potential and/or need to retain existing office functions in light of office to residential permitted development rights (see Policy E1 Offices).

Figure 2.17 - Town centre network



Town Centre Network

- International
- Metropolitan
- Major
- District
- CAZ

Source: GLA Planning

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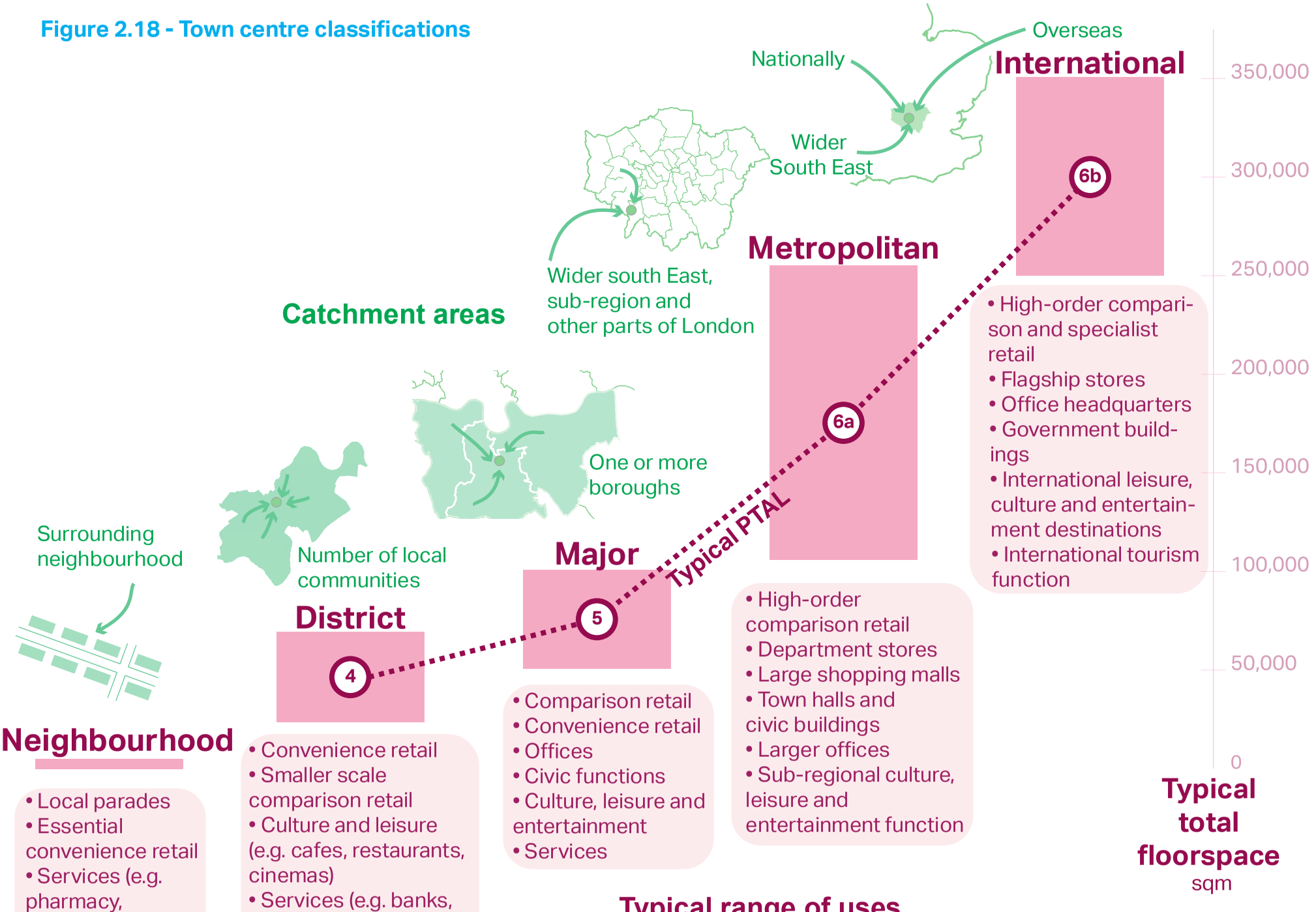
Figure 2.18 - Town centre classifications



2.8.1 **London's town centre network** is a vital element of London's economy and is crucial for meeting the needs of Londoners and those who work in and visit London. It promotes a broad distribution of centres of different roles and sizes across the capital, complementing the role of the Central Activities Zone, allowing all parts of London to access a wide variety of services, and enabling and encouraging local economies to thrive. Figure 2.18 shows typical characteristics of town centres within each classification.

2.8.2 The town centre network is dynamic and allows the role and function of centres to change over time. The role of individual centres within **the network will need to be proactively managed** in order to ensure that the network as a whole continues to serve the needs of Londoners and London's economy. In some instances, particularly within Opportunity Areas, it may be appropriate to designate new town centres to meet the needs of the local community and to serve areas of deficiency for certain uses. It may also be appropriate to re-classify some existing centres, in order to respond to shifts in demand for commercial uses or to reflect significant spatial, environmental and public transport connectivity improvements to existing out-of-centre retail parks.

2.8.3 Given the strategic importance of the larger town centres, **changes to the classification** of existing or proposed International, Metropolitan and Major centres must only be undertaken through the London Plan. Changes to the classification of District, Local and Neighbourhood centres can be brought forward in Local Plans. It is important that any changes or additions to the town centres network are supported by robust evidence, particularly looking at the wider impact on the network, informed by regular town centre health checks, and undertaken alongside reviews of town centre boundaries. To assist with this process, Table A1.1 in Annex 1 provides an indication of potential future changes to the town centre network over the Plan period, including new potential centres.

2.8.4 Centres with a future potential network classification in Table A1.1 (Town Centre Network) are not recommended for immediate reclassification, however it is recognised that they may be appropriate for future reclassification, subject to strategic and Local Plan policies and conditional on matters such as capacity analysis, impact assessments, land use, public transport, walking and cycling, planning approvals and full implementation. Many of the areas identified as future potential town centres, and centres with the potential to be reclassified at a higher level in the town centre hierarchy (see Annex 1), currently contain retail parks, dominated by large format stores and heavily reliant on travel by car. For these areas to be reclassified, a **clear strategy** should be developed and implemented (see Policy SD9 Town centres: Local partnerships and implementation) that secures a broader mix of store sizes and formats and a variety of town centre uses including retail, leisure, employment and social

infrastructure, subject to demand, capacity and impact. The sizes and uses of premises should relate to the role of the future centre within the town centre hierarchy. Such areas also present significant opportunities to reduce reliance on car travel, create attractive and welcoming places that encourage and enable walking, cycling and the use of public transport, and facilitate new housing.

Policy SD9 Town centres: Local partnerships and implementation

A Strategic and local partnership approaches should be supported and encouraged to develop strong, resilient and adaptable town centres, fulfilling their potential to accommodate growth and development. These partnerships may be in the form of town centre management, business associations, Neighbourhood Forums, trader associations and Business Improvement Districts, and should be inclusive and representative of the local community.

B The development of Town Centre Strategies is encouraged, particularly for centres that are undergoing transformative change, have projected declining demand, have significant infrastructure planned or are identified as future potential centres in Table A1.1. Town Centre Strategies should be produced in partnership at the local level in a way that is inclusive and representative of the local community.

C Regular town centre health checks should be undertaken to inform strategic and local policy and implementation.

D Boroughs should:

1) introduce targeted Article 4 Directions where appropriate and justified to remove permitted development rights for office, light industrial and retail to residential in order to sustain town centre vitality and viability and to maintain flexibility for more comprehensive approaches to town centre housing and mixed-use intensification. When considering office to residential Article 4 Directions in town centres, boroughs are encouraged to take into account guidelines in Annex 1 and Policy E1 Offices as well as local circumstances

2) take a proactive and partnership-based approach to bring sites forward for redevelopment, supporting land assembly in collaboration with local stakeholders including, where appropriate, through the compulsory purchase process

3) consider the range of mechanisms to deliver housing intensification, mixed-use development and ongoing asset management such as town centre investment models and the contribution of specialist forms of housing investment.

2.9.1 Each town centre is unique. They have their own economic geographies, specialisms and character. They are changing in different ways and have different relationships with the residential and other areas around them. Some have more capacity and potential to grow than others. All town centres, however, will change – many of them significantly – due to the restructuring of the retail sector and other changes in the wider economy. **A strategy should be developed for town centres that are experiencing significant change**, such as projected declining demand, or significant planned infrastructure, or town centres that are identified as future potential centres in Table A1.1. This is necessary to ensure that the local community continues to be well served and that the network of town centres across London continues to function successfully.

2.9.2 Town Centre **Strategies should be tailored to each town centre**. A clear vision should be developed with the local community, taking account of the town centre's strategic role, opportunities for growth, potential to support regeneration, spatial characteristics, economic challenges, and location in inner or outer London. Strategies should also consider the role of the night-time economy, as well as the cultural, heritage and tourism characteristics of the area. Town Centre Strategies should cover a broad remit, co-ordinating a tailored approach to planning, environmental health, licensing, Healthy Streets, transport strategy, highways management, logistics and servicing, regeneration, air quality, investment and projects. They should be developed with input from relevant stakeholders, including TfL, commercial landlords and investors, Business Improvement Districts and business associations, social infrastructure providers, Historic England, and community and amenity groups. Town Centre Strategies should pay particular regard to the social and economic benefits of high streets as well as their function and character within town centres, especially the formal and informal networks that support local communities. They should also have regard to commercial and social activity that serves particular groups and communities.

2.9.3 Boroughs should undertake **town centre health checks** regularly. This should be informed by the London-wide town centre health check[25] and should be tailored to local circumstances. Town centre health checks should take information from a variety of sources, including desk-based research as well as on-the-ground surveys, to establish the overall health of the town centre. This should include an analysis of the performance of commercial premises in the town centre as well as wider issues such as environmental quality and accessibility.

2.9.4 In many town centres in London, there is particular pressure on commercial floorspace to be converted to residential use. In order to ensure the vitality and vibrancy of town centres it is important that they contain an appropriate mix and quantity of office and other commercial floorspace, which can be supported through **Article 4 Directions**. Article 4 Directions can also be a useful tool for ensuring that development is undertaken in accordance with the Development Plan, particularly where comprehensive redevelopment is planned. In putting in place Article 4 Directions, boroughs should have regard to local evidence such as employment land and premises studies and the indicative categorisations for individual town centres set out in Annex 1.

2.9.5 The implementation of policy to diversify, intensify and realise the housing potential of town centres can be supported by a **range of mechanisms for investment and ongoing management**. Examples include Real Estate Investment Trusts, Local Asset-Backed Vehicles and Tax Increment Financing as well as specialist forms of housing investment such as Build to Rent, older people's and student housing.

Policy SD10 Strategic and local regeneration

A The Mayor will provide leadership and support for regeneration through this Plan and his other strategies and programmes.

B Boroughs should:

1) identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans and develop policies that are based on a thorough understanding of the demographics of communities and their needs

2) seek to identify Local Areas for Regeneration taking into account local circumstances

25 London Town Centre Health Check, GLA, 2017

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3) engage and collaborate with communities, particularly those in Strategic and Local Areas for Regeneration, at an early stage and throughout the development of local development documents, strategies and regeneration programmes

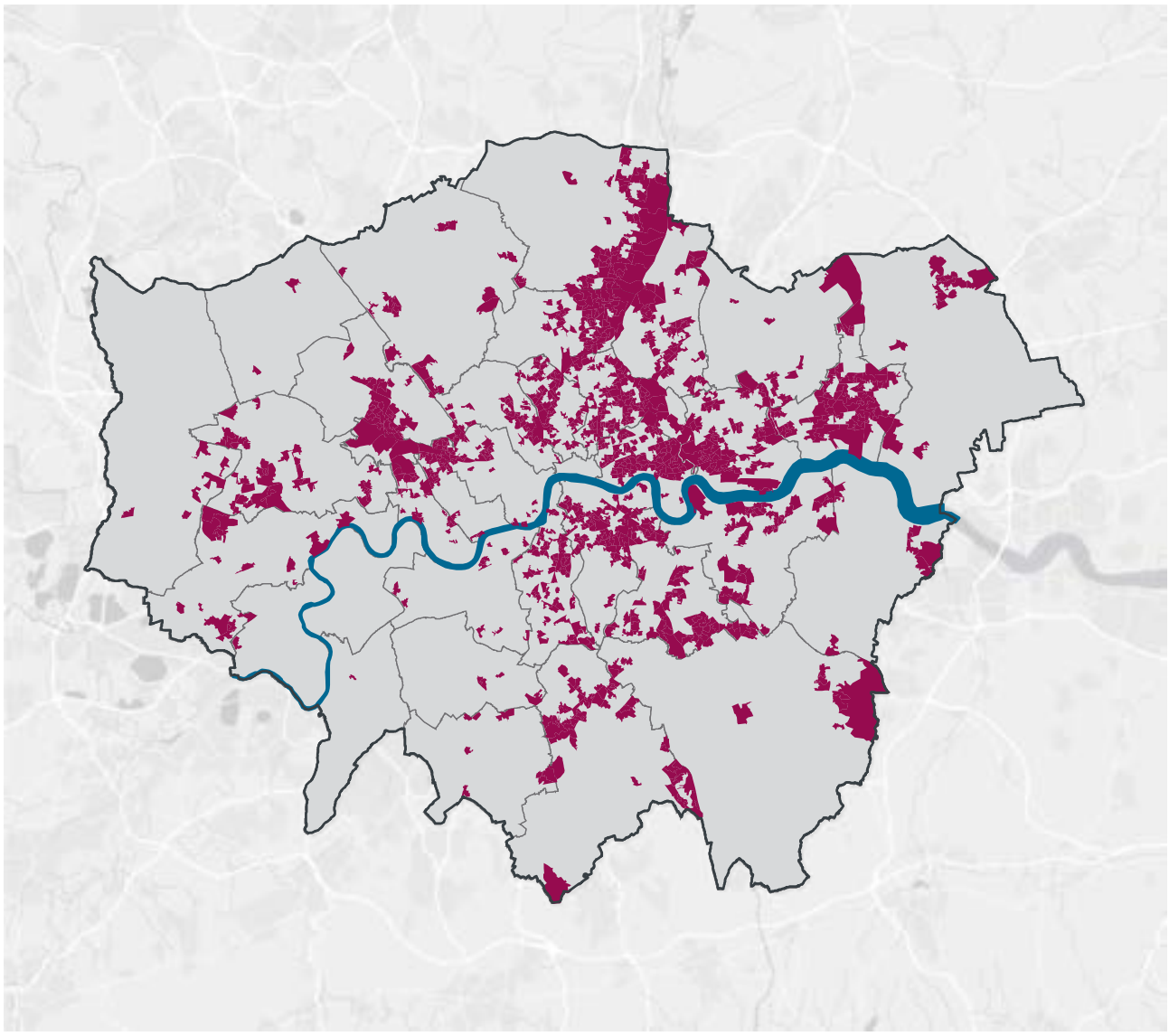
C Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration.

D Boroughs and other stakeholders should develop locally-sensitive policies and initiatives and support development proposals that contribute to the renewal of town centres in Strategic and Local Areas for Regeneration (see Town Centres policies and Annex 1).

2.10.1 There are parts of London where the impacts of inequality and causes of deprivation are particularly concentrated. Based on the Index of Multiple Deprivation (IMD), many of the city's neighbourhoods lie within the 20 per cent most deprived areas in England. These areas are defined in the London Plan as **Strategic Areas for Regeneration**. In addition, there are other parts of London where the impacts of inequality are acutely felt, which may not be fully reflected in the IMD; where relevant, these should be identified in Local Plans as **Local Areas for Regeneration**.

2.10.2 In order for **regeneration initiatives to contribute to Good Growth** it is important that they tackle poverty, disadvantage, inequality and the causes of deprivation, address social, economic and environmental barriers and benefit existing residents and businesses in an area. Regeneration can take many forms and involve changes of different scale and with different impacts, depending on the needs of local communities and the character of the area. Often regeneration will take the form of incremental improvements over a number of years, involving a range of projects and initiatives, such as providing affordable workspace, creating more accessible and welcoming public realm, or investing in training and employment opportunities for local residents. Where proposed, large-scale development in Areas for Regeneration should seek to reduce inequalities.

Figure 2.19 - Strategic Areas for Regeneration (based on 20 per cent most deprived lower super output areas in England)



Strategic Areas for Regeneration

- Strategic areas for regeneration

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2.10.3 All stakeholders, communities and individuals have a role to play in tackling poverty, disadvantage, inequality and the causes of deprivation, particularly in places where their impacts are acutely felt. There should be a focus on these areas in strategies, decisions, and bids for funding undertaken by the boroughs, the GLA family and other stakeholders to ensure these areas benefit from investment in strategic infrastructure, social infrastructure, and regeneration initiatives. In order to be effective in improving the lives of those most affected by inequality, regeneration initiatives must be undertaken in **collaboration with local communities**, involving a broad spectrum of groups, businesses and individuals, to develop a shared vision for the area. Successful regeneration requires all stakeholders to operate in a collaborative way, pooling resources and creating partnerships. There should be a shared understanding of how the regeneration area needs to change, and how that change will be secured, managed, embedded within and supported by the community. By taking an integrated, spatial approach to a wide range of issues, Development Plans and Opportunity Area Planning Frameworks have a key role to play in tackling inequalities and the causes of deprivation. It is important that these are developed through engagement with local communities.

2.10.4 In preparing plans, strategies and initiatives for the Strategic and Local Areas for Regeneration, boroughs should use their local knowledge and that of their communities to identify and **understand the particular needs of these areas**. The individual measures of deprivation that make up the IMD and other evidence, including baseline social, economic and environmental information should be used to inform the preparation and monitoring of Local Plans and regeneration strategies. Boroughs should identify Strategic and Local Areas for Regeneration in Local Plans and include policies that address the particular issues that affect them and the surrounding areas.

2.10.5 Many of the Opportunity Areas identified in the London Plan intersect with Areas for Regeneration. Where this is the case, Development Plans and Opportunity Area Planning Frameworks should identify the particular needs and character of the area, and identify how investment and development should **tackle the specific causes of deprivation** that impact on the lives of people in the area, while enriching the qualities of the area that make it unique.

2.10.6 The Areas for Regeneration are home to many established and varied communities, and there is likely to be a strong sense of place, local identity, and character that is reflected in the buildings, streets and spaces in the area, the lives of the people that live there and the activities that take place. Local Plans, Opportunity Area Planning Frameworks, and regeneration strategies should identify, protect and promote the **places and spaces that are particularly valued by local communities** and other stakeholders, including cultural venues,

heritage assets, community facilities and social infrastructure, as well as creating new spaces for people to enjoy.

2.10.7 Annex 1 identifies the town centres that are within or intersect with Strategic Areas for Regeneration. Development Plans, Opportunity Area Planning Frameworks, and town centre and regeneration strategies should consider the needs of these town centres and others that are easily accessible from Areas for Regeneration, and set out how **town centre renewal and investment** will contribute to the regeneration of the area. Town centre strategies and Local Plans should address in detail the particular performance of town centres and their role in providing access to local services and employment opportunities for the Areas for Regeneration.

Chapter 3

Design

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Policy D1 London's form, character and capacity for growth

Defining an area's character to understand its capacity for growth

A Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover the elements listed below:

1) demographic make-up and socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)
2) housing types and tenure
3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)
4) existing and planned transport networks (particularly walking and cycling networks) and public transport connectivity
5) air quality and noise levels
6) open space networks, green infrastructure, and water bodies
7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character)
8) topography and hydrology
9) land availability
10) existing and emerging Development Plan designations
11) land uses
12) views and landmarks.

Planning for growth

B In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by:

1) using the findings of area assessments (as required in Part A) to identify suitable locations for growth, and the potential scale of that growth (e.g. opportunities for extensive, moderate or limited growth) consistent with the spatial approach set out in this Plan; and

2) assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; and

3) following the design-led approach (set out in Policy D3 Optimising site capacity through the design-led approach) to establish optimised site capacities for site allocations. Boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different land uses.

3.1.1 This Plan provides a policy framework for delivering Good Growth through good design. Part A of this policy sets out the requirements for assessing an area's characteristics and Part B sets out the steps for using this information to establish the capacity for growth of different areas and ensure that sites are developed to an optimum capacity that is responsive to the site's context and supporting infrastructure.

3.1.2 **Understanding the existing character and context** of individual areas is essential in determining how different places may best develop in the future. An evaluation of the current characteristics of a place, how its past social, cultural, physical and environmental influences have shaped it and what the potential opportunities are for it to change will help inform an understanding of an area's capacity for growth and is crucial for ensuring that growth and development is inclusive.

3.1.3 It is important to understand **how places are perceived, experienced and valued**. Those involved in commissioning or undertaking area assessments should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work.

3.1.4 **Area assessments** should be used to identify the areas that are appropriate for extensive, moderate, or limited growth to accommodate borough-wide growth requirements. This analysis should form the foundation of Development Plan preparation and area-based strategies. This process will be fundamental to inform decision making on how places should develop, speeding up the Development Plan process and bringing about better-quality development. It will also help speed up planning decision making by providing an easily accessible knowledge-base about an area that is integrated in Development Plan policies.

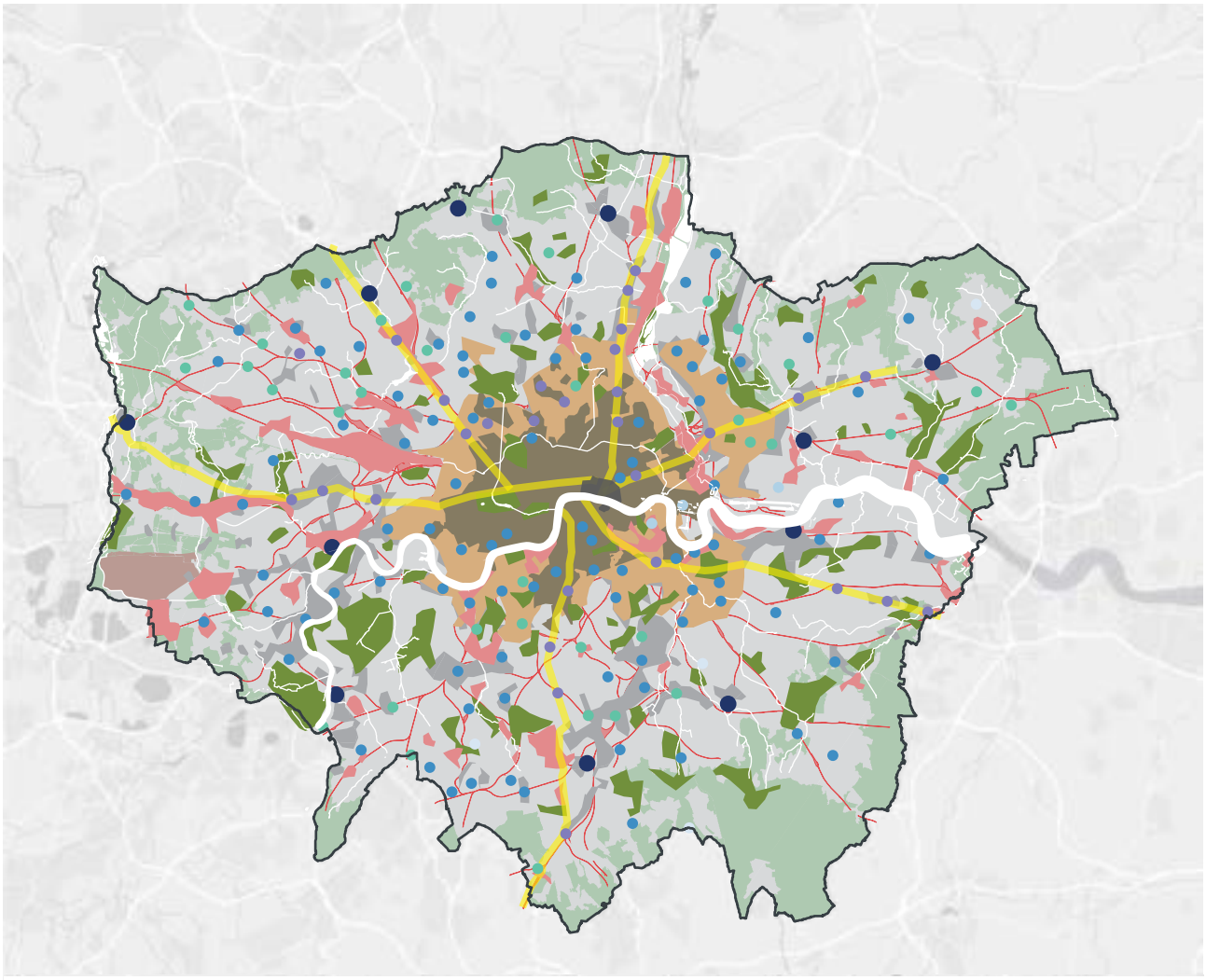
3.1.5 When identifying the growth potential of areas and sites the **sequential spatial approach to making the best use of land** set out in GG2 Parts A to C should be followed.

3.1.6 The process set out in this policy, of evidence gathering and establishing the location and scale of growth in an area, provides the opportunity to **engage and collaborate with the local community and other stakeholders** as part of the plan making process, enabling them to help shape their surroundings. The requirements of Parts A and B help to inform the identification of locations that may be suitable for tall buildings, see Policy D9 Tall buildings.

3.1.7 As change is a fundamental characteristic of London, **respecting character and accommodating change** should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued.

3.1.8 The Mayor will provide **supplementary planning guidance** to provide additional support for boroughs when implementing the policy. Figure 3.1 illustrates the broad characteristics of London as derived from its historical development, which can be used to inform area-based strategies.

Figure 3.1 - Outline Character Map of London



Character Map of London

- 20th century suburbs
- Victorian suburbs
- Victorian entrepreneurship
- Georgian planning and growth
- The Square Mile
- Green spaces
- Green belt
- Heathrow

Town Centres

- 20th century
- Industrial
- Railway town centre
- Historic
- Former medieval market town
- High road centre
- High roads

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19th Century Industry

- Industry
- Infrastructure
- Waterways

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Policy D2 Infrastructure requirements for sustainable densities

A The density of development proposals should:

1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels
2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services)[26].

B Where there is currently insufficient capacity of existing infrastructure to support proposed densities (including the impact of cumulative development), boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. This may mean that if the development is contingent on the provision of new infrastructure, including public transport services, it will be appropriate that the development is phased accordingly.

C When a proposed development is acceptable in terms of use, scale and massing, given the surrounding built form, uses and character, but it exceeds the capacity identified in a site allocation or the site is not allocated, and the borough considers the planned infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development. This will be identified through an infrastructure assessment during the planning application process, which will have regard to the local infrastructure delivery plan or programme, and the CIL contribution that the development will make. Where additional required infrastructure cannot be delivered, the scale of the development should be reconsidered to reflect the capacity of current or future planned supporting infrastructure.

26 PTAL and Time Mapping (TIM) catchment analysis is available on TfL's WebCAT webpage. TIM provides data showing access to employment, town centres, health services, and educational establishments as well as displaying the population catchment for a given point in London (see Public Transport Access Levels (PTALs) in Glossary for more information on WebCAT and Time Mapping).

3.2.1 **Infrastructure** provision should be proportionate to the scale of development. The locations and scale of growth will be identified through boroughs' Development Plans, particularly through site allocations. Infrastructure capacity, having regard to the growth identified in the Development Plan, should be identified in boroughs' infrastructure delivery plans or programmes. Boroughs and infrastructure providers should also consider the cumulative impact of multiple development proposals in an area.

3.2.2 If development comes forward with a capacity in excess of that which could be supported by current or future planned infrastructure, a **site-specific infrastructure** assessment will be required. This assessment should establish what additional impact the proposed development will have on current and planned infrastructure, and how this can be appropriately mitigated either on the site, or through an off-site mechanism, having regard to the amount of CIL generated.

3.2.3 The **capacity of existing and future public transport services**, and the connections they provide, should be taken into consideration, as should the potential to increase this capacity through financial contributions and by joint working with Transport for London. In general, the higher the public transport access and connectivity of the site, and the closer it is to a town centre or station, the higher the density and the lower the car parking provision should be. The ability to support higher densities through encouraging increased levels of active travel should be taken into account.

3.2.4 **Minor developments** will typically have incremental impacts on local infrastructure capacity. The cumulative demands on infrastructure of minor development should be addressed in boroughs' infrastructure delivery plans or programmes. Therefore, it will not normally be necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse permission to these schemes on the grounds of infrastructure capacity.

3.2.5 In certain circumstances, development will be contingent on the future provision of public transport, walking and cycling infrastructure. In many areas of London higher densities could be supported by maximising the potential of active travel. Those limited circumstances for which Part B of the policy could apply include development being brought forward in areas where planned public transport schemes will significantly improve accessibility and capacity of an area, such as Crossrail 2, DLR extensions, extension of the Elizabeth line, and the Bakerloo line Extension. It may be necessary to require the **phasing of development proposals** to maximise the benefits from major infrastructure and services investment whilst avoiding any unacceptable impacts on existing infrastructure prior to the new capacity being available.

3.2.6 In order to support the Healthy Streets Approach, development proposals should take account of the existing and planned **connectivity of a site via public transport and active modes** to town centres, social infrastructure and other services and places of employment. Opportunities to improve these connections to support higher density development should be identified.

Policy D3 Optimising site capacity through the design-led approach

The design-led approach

A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in Policy D2 Infrastructure requirements for sustainable densities), and that best delivers the requirements set out in Part D.

B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.

C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2 Small sites.

D Development proposals should:

Form and layout

1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions

2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
3) be street-based with clearly defined public and private environments
4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

Experience

5) achieve safe, secure and inclusive environments
6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
7) deliver appropriate outlook, privacy and amenity
8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
9) help prevent or mitigate the impacts of noise and poor air quality
10) achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and character

11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
13) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy

14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

E Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.

3.3.1 For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land by optimising site capacity. This means ensuring the development's form is the most appropriate for the site and land uses meet identified needs. The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.

3.3.2 **A design-led approach** to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.

3.3.3 The **area assessment** required by Part A of Policy D1 London's form, character and capacity for growth, coupled with an area's assessed capacity for growth as required by Part B of Policy D1 London's form, character and capacity for growth, will assist in understanding a site's context and determining what form of development is most appropriate for a site. Design options for the site should be assessed to ensure the proposed development best delivers the design outcomes in Part B of this policy.

3.3.4 Designating appropriate development capacities through site allocations enables boroughs to proactively optimise the capacity of strategic sites through a consultative design-led approach that allows for **meaningful engagement and collaboration** with local communities, organisations and businesses.

3.3.5 Developers should have regard to designated development capacities in allocated sites and ensure that the design-led approach to optimising capacity on unallocated sites is carefully applied when **formulating bids** for development sites. The sum paid for a development site is not a relevant consideration in determining acceptable densities and any overpayments cannot be recouped through compromised design or reduced planning obligations.

3.3.6 **Good design** and good planning are intrinsically linked. The form and character of London's buildings and spaces must be appropriate for their location, fit for purpose, respond to changing needs of Londoners, be inclusive, and make

the best use the city's finite supply of land. The efficient use of land requires optimisation of density. This means coordinating the layout of the development with the form and scale of the buildings and the location of the different land uses, and facilitating convenient pedestrian connectivity to activities and services.

3.3.7 Developments that show a clear understanding of, and relationship with, the distinctive features of a place are more likely to be successful. These features include buildings, structures, open spaces, public realm and the underlying landscape. Development should be designed to respond to the **special characteristics** of these features which can include: predominant architectural styles and/or building materials; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value. The Mayor will provide further guidance on assessing and optimising site capacity through a design-led approach.

3.3.8 Buildings should be of high quality and enhance, activate and appropriately frame the **public realm**. Their massing, scale and layout should help make public spaces coherent and should complement the existing streetscape and surrounding area. Particular attention should be paid to the design of the parts of a building or public realm that people most frequently see or interact with in terms of its legibility, use, detailing, materials and location of entrances. Creating a comfortable pedestrian environment with regard to levels of sunlight, shade, wind, and shelter from precipitation is important.

3.3.9 Measures to design out exposure to poor air quality and noise from both external and internal sources should be integral to development proposals and be considered early in the design process. Characteristics that increase pollutant or noise levels, such as poorly-located emission sources, street canyons and noise sources should also be designed out wherever possible. Optimising site layout and building design can also reduce the risk of overheating as well as minimising carbon emissions by reducing energy demand.

3.3.10 To minimise the use of new materials, the following **circular economy principles** (see also Figure 3.2) should be taken into account at the start of the design process and, for referable applications or where a lower local threshold has been established, be set out in a Circular Economy Statement (see Policy SI 7 Reducing waste and supporting the circular economy):

- building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary

- designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build and re-use of secondary products and materials
- designing for longevity
- designing for adaptability or flexibility
- designing for disassembly
- using systems, elements or materials that can be re-used and recycled.

3.3.11 Large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a circular economy, where materials, products and assets are kept at their highest value for as long as possible. Further guidance on the application of these principles through Circular Economy Statements will be provided.

3.3.12 Figure 3.2 shows a **hierarchy for building approaches** which maximises use of existing materials. Diminishing returns are gained by moving through the hierarchy outwards, working through refurbishment and re-use through to the least preferable option of recycling materials produced by the building or demolition process. The best use of the land needs to be taken into consideration when deciding whether to retain existing buildings in a development.

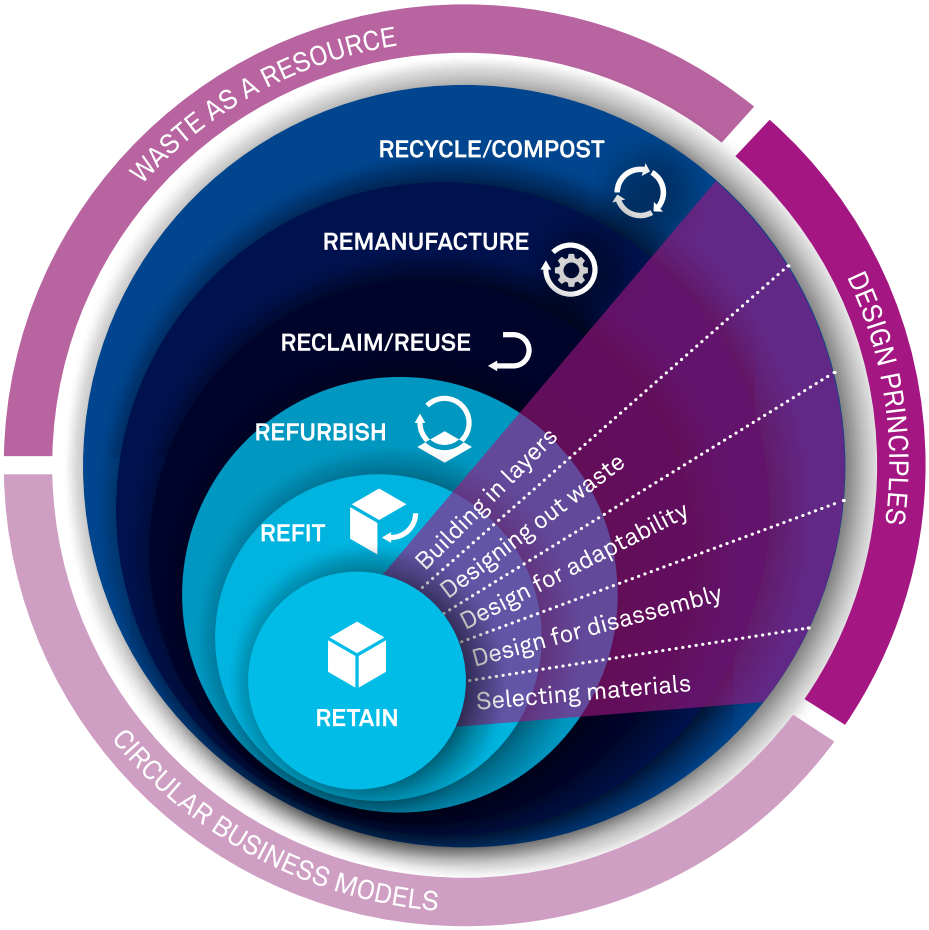
3.3.13 **Maximising urban greening** and creating green open spaces provides attractive places for Londoners to relax and play, and helps make the city more resilient to the effects of climate change. Landscaping and urban greening should be designed to ecologically enhance and, where possible, physically connect, existing parks and open spaces.

3.3.14 Measures to **design out crime** should be integral to development proposals and be considered early in the design process. Development should reduce opportunities for anti-social behaviour, criminal activities, and terrorism, and contribute to a sense of safety without being overbearing or intimidating. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places.

3.3.15 Development should create **inclusive places** that meet the needs of all potential users.

3.3.16 The design and layout of development should reduce the dominance of cars and provide permeability to **support active travel** (public transport, walking and cycling), community interaction and economic vitality.

Figure 3.2 - Circular economy hierarchy for building approaches



Source: Building Revolutions (2016), David Cheshire, RIBA Publishing ©

3.3.17 New developments should be designed and managed so that **deliveries** can be received outside of peak hours and if necessary in the evening or night-time without causing unacceptable nuisance to residents. Appropriate facilities will be required to minimise additional freight trips arising from missed deliveries.

3.3.18 Shared and easily accessible **storage space** supporting separate collection of dry recyclables, food waste and other waste should be considered in the early design stages to help improve recycling rates, reduce smell, odour and vehicle movements, and improve street scene and community safety.

3.3.19 Buildings and spaces should be designed so that they can **adapt to changing uses** and demands now and in the future. Their lifespan and potential uses or requirements should be carefully considered, creating buildings and spaces

that are easy to maintain, and constructed of materials that are safe, robust and remain attractive over time.

3.3.20 **Masterplans and strategic frameworks** should be used when planning large-scale development to create welcoming and inclusive neighbourhoods, promote active travel, enable the successful integration of the built form within its surrounding area, and deliver wider benefits to residents, such as access to shared amenity space and high-quality public realm.

Monitoring density and site capacity

3.3.21 **Comparing density** between schemes using a single measure can be misleading as it is heavily dependent on the area included in the planning application site boundary as well as the size of residential units. Planning application boundaries are determined by the applicant. These boundaries may be drawn very close to the proposed buildings, missing out adjacent areas of open space, which results in a density which belies the real character of a scheme. Alternatively, the application boundary may include a large site area so that a tall building appears to be a relatively low-density scheme while its physical form is more akin to schemes with a much higher density.

3.3.22 To help assess, monitor and compare development proposals several measures of density are required to be provided by the applicant. Density measures related to the residential population will be relevant for infrastructure provision, while measures of density related to the built form and massing will inform its integration with the surrounding context. The following **measurements of density** should be provided for all planning applications that include new residential units:

1. number of units per hectare
2. number of habitable rooms per hectare
3. number of bedrooms per hectare
4. number of bedspaces per hectare.

3.3.23 Measures relating to height and scale should be the maximum height of each building or major component in the development. Boroughs should report each of the required density measures provided by the applicant when they submit details of the development to the London Development Database. The following additional measurements should be provided for all major planning applications:

1. the Floor Area Ratio (total Gross External Area of all floors / site area)
2. the Site Coverage Ratio (Gross External Area of ground floors /site area)
3. the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level).

Policy D4 Delivering good design

Design analysis and development certainty

A Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.

B Where appropriate, visual, environmental and movement modelling/assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

Design scrutiny

C Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.

D The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:

1) include a residential component that exceeds 350 units per hectare; or
2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building.

E The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:

1) design reviews are carried out transparently by independent experts in relevant disciplines
2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme
3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews
4) design review recommendations are appropriately recorded and communicated to officers and decision makers
5) schemes show how they have considered and addressed the design review recommendations
6) planning decisions demonstrate how design review has been addressed.

Maintaining design quality

F The design quality of development should be retained through to completion by:

1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development
2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design
3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter
4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

3.4.1 The processes and actions set out in the policy will help ensure development delivers good design. The responsibility for undertaking a particular process or action will depend on the nature of the development or plan; however, the outcome of this process must ensure the most efficient use of land is made so that the development on all sites is optimised.

3.4.2 Applicants will primarily be responsible for undertaking design analysis through the use of various **digital modelling techniques** as part of a wide range of design and presentation techniques. These techniques can also be used as part of the plan-making process to assess growth options and forms of development, as described in Part B of Policy D1 London's form, character and capacity for growth.

3.4.3 To enable the design of a proposed development to be fully assessed, applicants must provide the necessary **technical information** in an agreed format. The detail and nature of this should be commensurate with the scale of the development. All outline applications referred to the Mayor should be accompanied by thorough design codes, ensuring exemplary design standards are carried through the planning process to completion.

3.4.4 The **Mayor's Design Advocates (MDAs)** will play a key role in helping to deliver good design. They will help champion design across the GLA Group and beyond, through research, design review, capacity building, commissioning and advocacy. MDAs are also members of the London Review Panel, which the Mayor has set up to provide design scrutiny. This review panel is primarily focused on the review of Mayoral investments, but can provide design review sessions for development proposals referred to the Mayor where they have not previously been subject to review, or for schemes of particular significance.

3.4.5 All development proposals should be subject to a level of scrutiny appropriate to the scale and/or impact of the project. This **design scrutiny** should include work by planning case officers and ongoing and informal review by qualified urban design officers and conservation officers. Development proposals required to undergo design review as set out under Part D will form a small portion of overall planning applications in London. The Mayor may require that other referable developments undergo design review. Boroughs are encouraged to use design review to support their scrutiny of development proposals.

3.4.6 The Mayor has published a **London Quality Review Charter**, with accompanying guidance. The Charter promotes a consistent approach across London's design review sector and promotes transparency of process. The Charter builds on

the established 2013 guidance[27] which calls for reviews to be independent, expert, multidisciplinary, accountable, transparent, proportionate, timely, advisory, objective and available. The Charter includes guidance on how panels and processes should be managed and records kept. It also clarifies that the purpose of the design review process is not to dictate the design of a scheme or contradict planning policy, but to guide better design outcomes. More widely, the Mayor's Good Growth by Design Programme, is developing a support offer to London's boroughs and London's review sector, for example, offering advice to boroughs wishing to put in place a design review function.

3.4.7 The **scrutiny** of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping. The design and access statement should explain the approach taken to these design issues (see also requirements of Policy D5 Inclusive design).

3.4.8 For **residential development** it is particularly important to scrutinise the qualitative aspects of the development design described in Policy D6 Housing quality and standards. The higher the density of a development the greater this scrutiny should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management. This is important because these elements of the development come under more pressure as the density increases. The housing minimum space standards set out in Policy D6 Housing quality and standards help ensure that as densities increase, quality of internal residential units is maintained.

3.4.9 **Higher density residential developments**[28] should demonstrate their on-going sustainability in terms of servicing, maintenance and management. Specifically, details should be provided of day-to-day servicing and deliveries, longer-term maintenance implications and the long-term affordability of running costs and service charges (by different types of occupiers).

3.4.10 It is important that **design quality is maintained throughout the development process** from the granting of planning permission to completion of a development. What happens to a design after planning consent can be instrumental to the success of a project and subsequent quality of a place. Changes to designs after the initial planning permission has been granted are

27 Design Review Principles and Practice, The Design Council, et al, 2013, available at: https://www.designcouncil.org.uk/sites/default/files/asset/document/DC%20Cabe%20Design%20Review%2013_W_0.pdf

28 Higher density residential developments are those with a density of at least 350 units per hectare

often allowable as minor amendments, or in the case of outline applications in the form of additional necessary detail. However, even minor changes can have a substantial effect on design quality, environmental quality and visual impact. The cumulative effect of amendments can often be significant and should be reviewed holistically. Sufficient design detail needs to be provided in approved drawings and other visual material, as well as in the wording of planning permissions to ensure clarity over what design has been approved, and to avoid future amendments and value engineering resulting in changes that would be detrimental to the design quality.

3.4.11 **Design codes** submitted with outline planning applications for large developments can be one such way to ensure that design quality is upheld throughout the planning process. Their main purpose is to describe the key design principles of a development proposal in a simple, concise and mainly graphical format, and they should draw on the proposal's layout, massing and heights to define the principal features that make up the overall design integrity of the scheme. Assessment of the design of large elements of a development, such as landscaping or building façades, should be undertaken as part of assessing the whole development and not deferred for consideration after planning permission has been granted.

3.4.12 Having a sufficient level of design information, including key construction details provided as part of the application, can help to ensure that the quality of design will be maintained if the permitted scheme is subject to subsequent minor amendments. However, it is also generally beneficial to the design quality of a completed development if the **architectural design team is involved in the development from start to finish**[29]. Securing the design team's ongoing involvement can be achieved in a number of ways, such as through a condition of planning permission, as a design reviewer, or through an architect retention clause in a legal agreement.

29 Shaping London: How can London deliver good growth?, Mayor's Design Advisory Group, 2016

Policy D5 Inclusive design

A Boroughs, in preparing their Development Plans, should support the creation of inclusive neighbourhoods by embedding inclusive design, and collaborating with local communities in the development of planning policies that affect them.

B Development proposal should achieve the highest standards of accessible and inclusive design. They should:

1) be designed taking into account London's diverse population
2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion
3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment
4) be able to be entered, used and exited safely, easily and with dignity for all
5) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

C Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement.

3.5.1 The built environment includes the internal and external parts of buildings, as well as the spaces in between them. Despite recent progress in building a more accessible city, too many Londoners still experience barriers to living independent and dignified lives, due to the way the built environment has been designed and constructed or how it is managed. An **inclusive design approach** helps to ensure the diverse needs of all Londoners are integrated into Development Plans and proposals from the outset. This is essential to ensuring that the built environment is safe, accessible and convenient, and enables everyone to access the opportunities London has to offer.

3.5.2 **Inclusive design is indivisible from good design**. It is therefore essential to consider inclusive design and the development's contribution to the creation of inclusive neighbourhoods at the earliest possible stage in the development

process – from initial conception through to completion and, where relevant, the occupation and on-going management and maintenance of the development.

3.5.3 Inclusive design principles should be discussed with boroughs in advance of an application being submitted, to ensure that these principles are understood and incorporated into the original design concept. To demonstrate this, and to inform decision making, speed up the process and bring about better-quality development, an **inclusive design statement** is required as part of the Design and Access Statement. The inclusive design statement should:

- explain the design concept and illustrate how an inclusive design approach has been incorporated into this
- detail what best practice standards and design guidance documents have been applied in terms of inclusive design
- show that the potential impacts of the proposal on people and communities who share a protected characteristic and who will be affected by it have been considered
- set out how access and inclusion will be maintained and managed, including fire evacuation procedures
- detail engagement with relevant user groups, such as disabled or older people's organisations, or other equality groups.

3.5.4 The detail contained in the Design and Access Statements, including the inclusive design statement, should be proportionate to the scale and type of development.

3.5.5 The social factors that influence inclusion have a direct impact on well-being and are an important component in achieving more inclusive communities. Many factors that influence potential barriers to inclusion can be mitigated **by ensuring the involvement of local communities** in the planning policies and decisions that will affect them.

3.5.6 Inclusive design creates spaces and places that can facilitate social integration, enabling people to lead more interconnected lives. Development proposals should help to create **inclusive neighbourhoods** that cumulatively form a network in which people can live and work in a safe, healthy, supportive and inclusive environment. An inclusive neighbourhood approach will ensure that people are able to easily access services, facilities and amenities that are relevant to them and enable them to safely and easily move around by active travel modes through high-quality, people-focused spaces, while enjoying barrier-free access to surrounding areas and the wider city.

3.5.7 **Links to the wider neighbourhood** should be carefully considered, including networks of legible, logical, safe and navigable pedestrian routes, dropped kerbs and crossing points with associated tactile paving.

3.5.8 Where **security measures** are required in the external environment, the design and positioning of these should not adversely impact access and inclusion.

3.5.9 **Entrances** into buildings should be easily identifiable and should allow everyone to use them independently without additional effort, separation or special treatment. High and low level obstructions in buildings and in the public realm should be eliminated. The **internal environment** of developments should meet the highest standards in terms of access and inclusion, creating buildings which meet the needs of the existing and future population.

3.5.10 Buildings should be designed and built to accommodate robust **emergency evacuation** procedures for all building users, including those who require level access. All building users should be able to evacuate from a building with dignity and by as independent means as possible. Emergency carry down or carry up mechanical devices or similar interventions that rely on manual handling are not considered to be appropriate, for reasons of user dignity and independence. The installation of lifts which can be used for evacuation purposes (accompanied by a management plan) provide a dignified and more independent solution. The fire evacuation lifts and associated provisions should be appropriately designed, constructed and include the necessary controls suitable for the purposes intended. See also Policy D12 Fire safety.

3.5.11 When dealing with **historic buildings and heritage assets**, careful consideration should be given to inclusive design at an early stage. This is essential to securing successful schemes that will enable as many people as possible to access and enjoy the historic environment now and in the future.

3.5.12 The Mayor will assist boroughs and other agencies in implementing an inclusive design approach by providing **further guidance** where necessary, continuing to contribute to the development of national technical standards and supporting training and professional development programmes. Further guidance on inclusive design standards can be found in the following British Standard documents:

- BS8300-1:2018 Design of an accessible and inclusive built environment. External environment. Code of practice. January 2018.
- BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice. January 2018.

Policy D6 Housing quality and standards

A Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

B Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.

C Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

D The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.

E Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.

F Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Private internal space

1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.

2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.

3) A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.

4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m..

5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).

6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.

7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.

8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.

Private outside space

9) Where there are no higher local standards in the borough Development Plan Documents, a minimum of 5 sq.m. of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1

G The Mayor will produce guidance on the implementation of this policy for all housing tenures.

Table 3.1 - Minimum internal space standards for new dwellings^

Type of dwelling		Minimum gross internal floor areas+ and storage (square metres)			
Number of bedrooms (b)	Number of bed spaces (persons(p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *	N/A	N/A	1
	2p	50	58	N/A	1.5
2b	3p	61	70	N/A	2
	4p	70	79	N/A	2
3b	4p	74	84	90	2.5
	5p	86	93	99	2.5
	6p	95	102	108	2.5
4b	5p	90	97	103	3
	6p	99	106	112	3
	7p	108	115	121	3
	8p	117	124	130	3
5b	6p	103	110	116	3.5
	7p	112	119	125	3.5
	8p	121	128	134	3.5
6b	7p	116	123	129	4
	8p	125	132	138	4

Notes to Table 3.1

Key

b: bedrooms

p: persons

^ New dwelling in this context includes new build, conversions and change of use.

* Where a studio / one single bedroom one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39 sq.m. to 37 sq.m., as shown bracketed.

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[+] The Gross Internal Area (GIA) of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (sq.m.).

Built-in storage areas are included within the overall GIA and include an allowance of 0.5 sq.m. for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger.

GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with five or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included without increasing the GIA, provided that all aspects of the space standard have been met.

3.6.1 Housing can be delivered in different physical forms depending on the context and site characteristics. Ensuring homes are of adequate size and fit for purpose is crucial in an increasingly dense city; therefore this Plan sets out **minimum space standards** for dwellings of different sizes in Policy D6 Housing quality and standards and Table 3.1. This is based on the minimum gross internal floor area (GIA) relative to the number of occupants and takes into account commonly required furniture and the spaces needed for different activities and moving around. This means applicants should state the number of bedspaces/occupiers a home is designed to accommodate rather than simply the number of bedrooms. When designing homes for more than eight bedspaces, applicants should allow approximately 10 sq.m. per extra bedspace.

3.6.2 The space standards are minimums which applicants are encouraged to exceed. The **standards apply to all new self-contained dwellings** of any tenure, and consideration should be given to the elements that enable a home to become a comfortable place of retreat. The provision of additional services and spaces as part of a housing development, such as building management and communal amenity space, is not a justification for failing to deliver these minimum standards. Boroughs are, however, encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 for the number of bedspaces they contain due to the level of housing need and the need to make efficient use of land.

3.6.3 To address the impacts of the urban heat island effect and the fact that the majority of housing developments in London are made up of flats, a **minimum ceiling height** of 2.5m for at least 75 per cent of the gross internal area is required so that new housing is of adequate quality, especially in terms of daylight penetration, ventilation and cooling, and sense of space. The height

of ceilings, doorways and other thresholds should support the creation of an inclusive environment and therefore be sufficiently high to not cause an obstruction. To allow for some essential equipment in the ceilings of kitchens and bathrooms, up to 25 per cent of the gross internal area of the dwelling can be lower than 2.5 m. However, any reduction in ceiling height below 2.5 m should be the minimum necessary for this equipment, and not cause an obstruction.

3.6.4 **Dual aspect dwellings** with opening windows on at least two sides have many inherent benefits. These include better daylight, a greater chance of direct sunlight for longer periods, natural cross-ventilation, a greater capacity to address overheating, pollution mitigation, a choice of views, access to a quiet side of the building, greater flexibility in the use of rooms, and more potential for future adaptability by altering the use of rooms.

3.6.5 **Single aspect dwellings** are more difficult to ventilate naturally and are more likely to overheat, and therefore should normally be avoided. Single aspect dwellings that are north facing, contain three or more bedrooms or are exposed to noise levels above which significant adverse effects on health and quality of life occur, should be avoided. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy and daylight, and that the orientation enhances amenity, including views. It must also demonstrate how they will avoid overheating without reliance on energy intensive mechanical cooling systems.

3.6.6 A variety of approaches to housing typologies and **layout of buildings** should be explored to make the best use of land and create high quality, comfortable and attractive homes. For example, increasing ceiling heights and having bay windows can optimise daylight and sunlight and allow buildings to be closer together than can otherwise be achieved.

3.6.7 Housing developments should be designed to **maximise tenure integration**, and affordable housing units should have the same external appearance as private housing. All entrances will need to be well integrated with the rest of the development and should be indistinguishable from each other.

3.6.8 Development should help create a more socially inclusive London. **Gated forms of development** that could realistically be provided as a public street are unacceptable and alternative means of security should be achieved through utilising the principles of good urban design and inclusive design (see Policy D5 Inclusive design).

3.6.9 **Private outside space** should be practical in terms of its shape and utility, and care should be taken to ensure the space offers good amenity. All dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony. The use of

roof areas, including podiums, and courtyards for additional private or shared outside space is encouraged.

3.6.10 **Communal play space** should meet the requirements of Policy S4 Play and informal recreation.

Table 3.2 - Qualitative design aspects to be addressed in housing developments

Layout, orientation and form	
i	The built form, massing and height of the development should be appropriate for the surrounding context, and it should be shown that alternative arrangements to accommodate the same number of units or bedspaces with a different relationship to the surrounding context have been explored early in the design process (making use of the measures in paragraph 3.3.23), particularly where a proposal is above the applicable density indicated in Part D of Policy D4 Delivering good design
ii	The layout of the scheme (including spaces between and around buildings) should: • form a coherent, legible and navigable pattern of streets and blocks • engender street based activity and provide a sense of safety • maximise active frontages onto public facing sides of a development, where appropriate wrapping around inactive frontages
iii	The site layout, orientation and design of individual dwellings and, where applicable, common spaces should: • provide privacy and adequate daylight for residents • be orientated to optimise opportunities for visual interest through a range of immediate and longer range views, with the views from individual dwellings considered at an early design stage • provide clear and convenient routes with a feeling of safety • help reduce noise from common areas to individual dwellings • help meet the challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters

Outside space	
iv	Communal outside amenity spaces should: • provide sufficient space to meet the requirements of the number of residents • be designed to be easily accessed from all related dwellings • be located to be appreciated from the inside • be positioned to allow overlooking • be designed to support an appropriate balance of informal social activity and play opportunities for various age groups • meet the changing and diverse needs of different occupiers
v	Private amenity space for each dwelling should be usable and have a balance of openness and protection, appropriate for its outlook and orientation
Usability and ongoing maintenance	
vi	The development should ensure that: • the experience of arrival, via footpaths, entrances and shared circulation spaces is comfortable, accessible and fit for purpose • features are designed to allow maintenance activities such as window cleaning, to be undertaken with ease • sufficient levels of secure, covered and conveniently located externally accessible storage is provided for deliveries and other bulky items • recycling and waste disposal, storage and any on site management facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services*

* See also the London Waste and Recycling Board's Waste Management Planning Advice for New Flatted Properties 2014. http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/

3.6.11 Other components of housing design are also important to improving the attractiveness of new homes as well as the Mayor's wider objectives to improve the quality of Londoners' environment. The Mayor intends to produce a single **guidance** document which clearly sets out the standards which need to be met in order to implement Policy D6 Housing quality and standards for all housing tenures, as well as wider qualitative aspects of housing developments. This will include guidance on daylight and sunlight standards. This will build on the guidance set out in the 2016 Housing SPG and the previous London Housing Design Guide.

Policy D7 Accessible housing

A To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that:

1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) 'wheelchair user dwellings'

2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

3.7.1 Many households in London require **accessible or adapted housing** to lead dignified and independent lives. In addition, Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving due to inaccessible accommodation. To address these and future needs, Policy D7 Accessible housing should apply to all dwellings which are created via works to which Part M volume 1 of the Building Regulations applies,[30] which, at the time of publication of this Plan, generally limits the application of this policy to new build dwellings.

3.7.2 Where any part of an **approach route** – including the vertical circulation in the common parts of a block of flats – is shared between dwellings of different categories (i.e. M4(2) and M4(3)), the design provisions of the highest numbered category of dwelling served should be applied, to ensure that people can visit their neighbours with ease and are not limited by the design of communal areas. For residential disabled persons parking requirements – see Policy T6 .1 Residential parking.

3.7.3 To ensure that all potential residents have **choice within a development**, the requirement for M4(3) wheelchair user dwellings applies to all tenures. Wheelchair user dwellings should be distributed throughout a development to provide a range of aspects, floor level locations, views and unit sizes.

30 This is governed by the Building Regulations 2010: http://www.legislation.gov.uk/uksi/2010/2214/pdfs/uksi_20102214_en.pdf and the Building Regulations &c. (Amendment) Regulations 2015: http://www.legislation.gov.uk/uksi/2015/767/pdfs/uksi_20150767_en.pdf

3.7.4 Standard M4(3) wheelchair user dwellings distinguishes between '**wheelchair accessible**' (a home readily usable by a wheelchair user at the point of completion) and '**wheelchair adaptable**' (a home that can be easily adapted to meet the needs of a wheelchair user). Planning Practice Guidance[31] states that Local Plan policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, otherwise M4(3) dwellings should be wheelchair adaptable.

3.7.5 As set out in Approved Document M of the Building Regulations, Volume 1: Dwellings, to comply with requirements M4(2) or M4(3), **step-free access** into the dwelling must be provided.

3.7.6 In exceptional circumstances the provision of a lift to dwelling entrances may not be achievable. In the following circumstances – and only in blocks of four storeys or less – it may be necessary to apply some flexibility in the application of this policy:

- Specific small-scale infill developments (see Policy H2 Small sites)
- Flats above existing shops or garages
- Stacked maisonettes where the potential for decked access to lifts is restricted

3.7.7 If it is agreed at the planning stage (for one of the reasons listed above) that a specific development warrants flexibility in the application of the accessible housing standards M4(2) and M4(3), affected dwellings above or below ground floor would be required to satisfy the mandatory building regulations requirements of M4(1) via the Building Control process. M4(2) and M4(3) dwellings should still be required for ground floor units.

3.7.8 M4(2) and M4(3) dwellings should be **secured via planning condition** to allow the Building Control body to check compliance of a development against the optional Building Regulations standards. Planning conditions should specify:

- Number of dwellings per size typology (i.e. x no. of y bed units) which must comply with Part M4(2)
- Number of dwellings per size typology (i.e. x no. of y bed units) which must comply with Part M4(3)(2)(a) wheelchair adaptable standards
- Number of dwellings per size typology (i.e. x no. of y bed units) which must comply with Part M4(3)(2)(b) wheelchair accessible standards

31 https://www.gov.uk/guidance/housing-optional-technical-standards

Policy D8 Public realm

Development Plans and development proposals should:

A encourage and explore opportunities to create new public realm where appropriate

B ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution

C maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds

D be based on an understanding of how the public realm in an area functions and creates a sense of place during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of how people use the public realm, and the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists

E ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible

F ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm

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G ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm

H ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter

I incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity

J ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place

K ensure that street clutter, including street furniture that is poorly located, unsightly, in poor condition or without a clear function is removed, to ensure that pedestrian amenity is improved. Consideration should be given to the use, design and location of street furniture so that it complements the use and function of the space. Applications which seek to introduce unnecessary street furniture should be refused

L explore opportunities for innovative approaches to improving the public realm such as open street events and Play Streets

M create an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm

N ensure that any on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Parking should not obstruct pedestrian lines

O ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm.

3.8.1 The **public realm** includes all the publicly-accessible space between buildings, whether public or privately owned, from alleyways and streets to squares and open spaces, including the Thames and London's waterways. Some internal or elevated spaces can also be considered as part of the public realm, such as markets, shopping malls, sky gardens, viewing platforms, museums or station concourses. Such forms of public realm are particularly relevant in areas of higher density.

3.8.2 The quality of the public realm has a significant influence on quality of life because it affects people's sense of place, security and belonging, as well as having an influence on a range of health and social factors. For this reason, the public realm, and the buildings that frame those spaces, should be attractive, accessible, designed for people and contribute to the highest possible standards of comfort, good acoustic design, security and ease of movement. Higher levels of comfort should be sought in places where people will wish to sit, play, relax, meet, and dwell outside compared to other parts of the public realm that are primarily used for movement. As London's population grows, the demands on London's public realm to accommodate a greater **variety and intensity of uses** will increase. It is particularly important to recognise these demands in higher density development.

3.8.3 The public realm should be seen as a series of **connected routes and spaces** that help to define the character of a place. Around eighty per cent of public realm in London is in the form of streets and roads. A small proportion (less than eight per cent) of these have the primary purpose of moving large numbers of vehicles through them, while most are intended to be quiet residential streets used for play, recreation and local access. The remaining streets are places which function as key centres for leisure, shopping, culture, social interaction and accessing services and employment, such as high streets or public squares.

3.8.4 The specific balance between the different functions of any one space, such as its place-based activities, its function to facilitate movement and its ability to accommodate different uses of the kerbside, should be at the heart of how the space is designed and managed. The Mayor's **Healthy Streets Approach** explains how the design and management of streets can support a wide range of activities in the public realm as well as encourage and facilitate a shift to active travel.

3.8.5 **Pedestrian crossings** should be accessible and provide tactile paving and associated dropped kerbs or level access in accordance with national guidance.

3.8.6 Places should be distinctive, attractive and of the highest quality, allowing people to meet, congregate and socialise, as well as providing opportunity for quiet enjoyment. Public realm is **valuable for London's cultural activity**,

providing a stage for informal and everyday culture and for organised cultural activity. The opportunity to incorporate these uses should be identified and facilitated through community engagement, careful design and good acoustic design. Careful consideration is needed of the benefits of using the public realm for particular events and the impact of the events on the use and enjoyment of the space by the public.

3.8.7 **Legibility and signposting** make an important contribution to whether people feel comfortable in a place, and are able to understand it and navigate their way around. Transport for London's Streets Toolkit provides detailed design guidance for creating high quality streets and public spaces.

3.8.8 Even when a development does not include the creation of new public realm it will have an **impact on neighbouring public realm**. Therefore, any impact or change to the conditions, use or nature of existing public space brought about by a development should meet the requirements of this policy.

3.8.9 The effective **management and ongoing maintenance** of public realm should be a key consideration in the design of places and secured through the planning system where appropriate. Whether publicly or privately owned, public realm should be open, free to use and offer the highest level of public access. These spaces should only have rules restricting the behaviour of the public that are considered essential for safe management of the space. The Mayor will develop a 'Public London Charter' which will set out the rights and responsibilities for the users, owners and managers of public spaces irrespective of land ownership. The rules and restrictions on public access and behaviour covering all new or redeveloped public space and its management should be in accordance with the Public London Charter, and this requirement should be secured through legal agreement or planning condition.

3.8.10 The **lighting** of the public realm needs careful consideration to ensure it is appropriate to address safety and security issues, and make night-time activity areas and access routes welcoming and safe, while also minimising light pollution.

3.8.11 The provision of accessible **free drinking water** fountains helps improve public health, reduces waste from single-use plastic bottles and supports the circular economy through the use of reusable water bottles. Free drinking water fountains that can both refill water bottles directly and be drunk from should be provided in appropriate locations in new or redeveloped public realm. Appropriate locations for these water fountains should be identified by boroughs during the planning process. These locations include areas with high levels of pedestrian activity, such as in town centres and inside shopping malls, as well as areas of the public realm used for play, exercise and relaxing, such

as parks and squares. The ongoing management and maintenance of facilities should be secured and agreed at the planning stage to ensure long-term provision is achievable.

3.8.12 Opportunities should be identified by boroughs and applicants for the **meanwhile (temporary) use** of phased development sites to create attractive public realm. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties. Whilst the creation of temporary public realm makes the best use of land and provides visual, environmental and health benefits to the local community, planning permission for more permanent uses is still required.

Policy D9 Tall buildings

Definition

A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

Locations

B

1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.
2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.
3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.

Impacts

C Development proposals should address the following impacts:

1) visual impacts
    a) the views of buildings from different distances:

i long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views

ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality

iii immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding

c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area

e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it

f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river

g) buildings should not cause adverse reflected glare

h) buildings should be designed to minimise light pollution from internal and external lighting

2) functional impact

a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants

b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process

c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas

d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building

e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area

f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings

3) environmental impact

a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building

b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions

c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building

4) cumulative impacts

a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.

Public access

D Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

3.9.1 Whilst high density does not need to imply high rise, **tall buildings** can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity. However, they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor quality design. The processes set out below will enable boroughs to identify locations where tall buildings play a positive role in shaping the character of an area.

3.9.2 Boroughs should determine and **identify locations where tall buildings may be an appropriate form of development** by undertaking the steps below:

1. based on the areas identified for growth as part of Policy D1 London's form, character and capacity for growth, undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place
2. in these locations, determine the maximum height that could be acceptable
3. identify these locations and heights on maps in Development Plans.

3.9.3 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Boroughs should **define what is a 'tall building' for specific localities**, however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This does not mean that all buildings up to this height are automatically acceptable, such proposals will still need to be assessed in the context of other planning policies, by the boroughs in the usual way, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area. In large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context. This policy applies to tall buildings as defined by the borough. Where there is no local definition, the policy applies to buildings over 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

3.9.4 The higher the building the greater the level of **scrutiny** that is required of its design. In addition, tall buildings that are referable to the Mayor, must be subject to the particular design scrutiny requirements set out in Part D of Policy D4 Delivering good design.

3.9.5 The Mayor will work with boroughs to provide a **strategic overview of tall building locations** across London and will seek to utilise 3D virtual reality digital modelling to help identify these areas, assess tall building proposals and aid public consultation and engagement. 3D virtual reality modelling can also help assess cumulative impacts of developments, particularly those permitted but not yet completed.

3.9.6 A tall building can be considered to be made up of three main parts: a top, middle and base. The top includes the upper floors, and roof-top mechanical or telecommunications equipment and amenity space. The **top** should be designed to make a positive contribution to the quality and character of the skyline, and mechanical and telecommunications equipment must be integrated in the total

building design. Not all tall buildings need to be iconic landmarks and the design of the top of the building (i.e. the form, profile and materiality) should relate to the building's role within the existing context of London's skyline. Where publicly-accessible areas, including viewing areas on upper floors, are provided as a public benefit of the development, they should be freely accessible and in accordance with Part G of Policy D8 Public realm. Well-designed safety measures should be integrated into the design of tall buildings and must ensure personal safety at height.

3.9.7 The **middle** of a tall building has an important effect on how much sky is visible from surrounding streets and buildings, as well as on wind flow, privacy and the amount of sunlight and shadowing there is in the public realm and by surrounding properties.

3.9.8 The **base** of the tall building is its lower storeys. The function of the base should be to frame the public realm and streetscape, articulate entrances, and help create an attractive and lively public realm which provides a safe, inclusive, interesting, and comfortable pedestrian experience. The base should integrate with the street frontage of adjacent buildings and, where appropriate, enable the building to transition down in height.

3.9.9 Any **external lighting** for tall buildings should be minimal, energy efficient and designed to minimise glare, light trespass, and sky glow, and should not negatively impact on protected views, designated heritage assets and their settings, or the amenity of nearby residents.

3.9.10 The list of impacts of tall buildings in Policy D9 Tall buildings is not exhaustive and **other impacts** may need to be taken into consideration. For example, the impact of new tall buildings in proximity to waterbodies supporting notable bird species upon the birds' flight lines may need to be considered.

3.9.11 **Safety** considerations must be central to the design and operation of tall buildings. Policy D11 Safety, security and resilience to emergency provides information on how to ensure the design of buildings follows best practice to minimise the threats from fire, flood, terrorism, and other hazards and Policy D12 Fire safety sets out specific requirements to address fire risk.

Policy D10 Basement development

A Boroughs should establish policies in their Development Plans to address the negative impacts of large-scale basement development beneath existing buildings, where this is identified as an issue locally.

3.10.1 High residential land values and development constraints have led to **increasing levels of basement development** beneath existing buildings, particularly within central and inner London boroughs.

3.10.2 The construction of basements can cause significant disturbance and disruption if not managed effectively, especially where there are cumulative impacts from a concentration of subterranean developments. **Large-scale basements** (i.e. those that are multi-storey and/or those that extend significantly beyond the existing building footprint) can cause particular issues, especially when located in residential or higher density mixed-use areas. Such basement development can impact on land and structural stability as well as causing localised flooding or drainage issues. The extent and duration of construction of large-scale basements can also lead to a large number of HGV trips, as well as noise and vibration issues, causing disturbance to local residents. Measures such as requiring Construction Method and Management Plans can help protect neighbours during construction. Other consents and regulatory regimes may also be involved, such as Environmental Health in regard to noise and contamination, and Highways in relation to licences for skips and temporary structures.

3.10.3 The Mayor supports boroughs in **restricting large-scale basement excavations** under existing properties where this type of development is likely to cause unacceptable harm. Local authorities are advised to consider the following issues, including any cumulative impacts, alongside other relevant local circumstances when developing their own policies for basement developments: local ground conditions; flood risk and drainage impacts; land and structural stability; protection of trees, landscape, and biodiversity; archaeology and heritage assets; neighbour amenity; air and light pollution; and the impacts of noise, vibration, dust and site waste. Where particular and cumulative flood risk issues exist, boroughs should consider restricting the use of basements for non-habitable uses. The Agent of Change Principle (Policy D13 Agent of Change) should be applied to basement development to limit the impact of ground-borne noise and vibration from existing uses and

infrastructure. Further guidance will be provided in Supplementary Planning Guidance.

3.10.4 Most proposals for the construction of a basement will require planning permission. These proposals need to be managed sensitively through the planning application process to ensure that their potential impact on the local environment and residential amenity is acceptable.

3.10.5 Basement development (small or large) can also cause significant noise and vibration disturbance through the reflection/focusing of ground-borne vibration originating from existing infrastructure, such as London Underground infrastructure, if this issue is not considered and managed effectively during its design and construction. Impact assessments prior to construction should consider the effects on the ground-borne vibration environment and propose appropriate mitigation, especially for surrounding residents.

3.10.6 The Mayor considers that **smaller-scale basement excavations**, where they are appropriately designed and constructed, can contribute to the efficient use of land, and provide extra living space without the costs of moving house. In areas where basement developments could cause particular harm, boroughs can consider introducing **Article 4 Directions** to require smaller-scale proposals to obtain planning permission.

Policy D11 Safety, security and resilience to emergency

A The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.

B Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.

C Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather,

fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

3.11.1 Londoners look to the Mayor as a civic leader for support, advice and reassurance in the event of a major incident taking place. The role of the Mayor in an attack is an interconnected one and is clarified via his attendance at COBR[32] meetings about incidents affecting, or potentially affecting, London. The London Resilience Partnership maintains the **London Risk Register**[33]. The London Risk Register provides a summary of the main risks affecting London and identifies the existing risk management arrangements for the risks.

3.11.2 New developments, including building refurbishments, should be constructed with resilience at the heart of their design. In particular they should incorporate appropriate **fire safety** solutions and represent best practice in fire safety planning in both design and management. The London Fire Commissioner should be consulted early in the design process to ensure major developments have fire safety solutions built-in. Flooding issues and designing out the effects of flooding are addressed in Chapter 9.

3.11.3 Measures to **design out crime**, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme[34] published by the Police. Further guidance is provided by Government on security design[35]. This will ensure development proposals

32 COBR (often referred to as COBRA) stands for Cabinet Office Briefing Rooms, these are the locations the Government's emergency response committee set up to respond to major events and emergencies.

33 For further details see http://www.london.gov.uk/mayor-assembly/mayor/london-resilience

34 For further details see http://www.securedbydesign.com/

35 Crowded Places Guidance, National Counter Terrorism Security Office, 2017: https://www.gov.uk/government/publications/crowded-places-guidance; Crowded Places: The Planning System and Counter-Terrorism, Home Office and DCLG, 2012; and Protecting crowded places: design and technical issues, Home Office, Centre for the Protection of National Infrastructure and the National Counter-Terrorism Security Office, 2014: https://www.gov.uk/government/collections/crowded-places

provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

3.11.4 By drawing upon current Counter Terrorism principles, new development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of their detection, and delay/disrupt their activity until an appropriate response can be deployed. Consideration should be given to **physical, personnel and electronic security** (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

Policy D12 Fire safety

A In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

1) identify suitably positioned unobstructed outside space:
    a) for fire appliances to be positioned on
    b) appropriate for use as an evacuation assembly point
2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
3) are constructed in an appropriate way to minimise the risk of fire spread
4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in

6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

B All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

The statement should detail how the development proposal will function in terms of:

1) the building's construction: methods, products and materials used, including manufacturers' details
2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

3.12.1 The **fire safety of developments** should be considered from the outset. Development agreements, development briefs and procurement processes should be explicit about incorporating and requiring the highest standards of fire safety. How a building will function in terms of fire, emergency evacuation, and the safety of all users should be considered at the earliest possible stage to ensure the most successful outcomes are achieved, creating developments that are safe and that Londoners can have confidence living in and using.

3.12.2 The matter of fire safety compliance is covered by Part B of the Building Regulations. However, to ensure that development proposals achieve the

highest standards of fire safety, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole.

3.12.3 Applicants should demonstrate on a site plan that space has been identified for the **appropriate positioning of fire appliances**. These spaces should be kept clear of obstructions and conflicting uses which could result in the space not being available for its intended use in the future.

3.12.4 Applicants should also show on a site plan **appropriate evacuation assembly points**. These spaces should be positioned to ensure the safety of people using them in an evacuation situation.

3.12.5 Developments, their floor layouts and cores need to be **planned around issues of fire safety and a robust strategy for evacuation from the outset**, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve the highest standards of fire safety. This is of particular importance in blocks of flats, as building users and residents may be less familiar with evacuation procedures.

3.12.6 Suitable **suppression systems** (such as sprinklers) installed in buildings can reduce the risk to life and significantly reduce the degree of damage caused by fire, and should be explored at an early stage of building design.

3.12.7 The provision of **stair cores** which are suitably sized, provided in sufficient numbers and designed with appropriate features to allow simultaneous evacuation should also be explored at an early stage and provided wherever possible.

3.12.8 Policy D5 Inclusive design requires development to incorporate **safe and dignified emergency evacuation** for all building users, by as independent means as possible. In all developments where lifts are installed, Policy D5 Inclusive design requires as a minimum at least one lift per core (or more, subject to capacity assessments) to be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. Fire evacuation lifts and associated provisions should be appropriately designed and constructed, and should include the necessary controls suitable for the purposes intended.

3.12.9 **Fire statements** should be submitted with all major development proposals. These should be produced by a third-party independent, suitably-qualified

assessor. This should be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. Planning departments could work with and be assisted by suitably qualified and experienced officers within borough building control departments and/or the London Fire Brigade, in the evaluation of these statements.

3.12.10 **Fire safety and security measures** should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.

3.12.11 **Refurbishment** that requires planning permission will be subject to London Plan policy. Some refurbishment may not require planning permission; nevertheless, the Mayor expects steps to be taken to ensure all existing buildings are safe, taking account of the considerations set out in this policy, as a matter of priority.

Policy D13 Agent of Change

A The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby.

B Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

C New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.

D Development proposals should manage noise and other potential nuisances by:

1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations
3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

E Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.

3.13.1 For a long time, the responsibility for managing and **mitigating the impact of noise** and other nuisances on neighbouring residents and businesses has been placed on the business or activity making the noise or other nuisance, regardless of how long the business or activity has been operating in the area. In many cases, this has led to newly-arrived residents complaining about noise and other nuisances from existing businesses or activities, sometimes forcing the businesses or other activities to close.

3.13.2 The **Agent of Change principle** places the responsibility for mitigating the impact of noise and other nuisances firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, for example, applicants will need to design them in a more sensitive way to protect the new occupiers, such as residents, businesses, schools and religious institutions, from noise and other impacts. This could include paying for soundproofing for an existing use, such as a music venue. The Agent of Change principle works both ways. For example, if a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts.

3.13.3 The Agent of Change principle is included in the National Planning Policy Framework, and **Planning Practice Guidance** provides further information on

how to mitigate the adverse impacts of noise and other impacts such as air and light pollution.[36]

3.13.4 The Agent of Change principle predominantly concerns the impacts of noise-generating uses and activities but **other nuisances** should be considered under this policy. Other nuisances include dust, odour, light and vibrations (see Policy SI 1 Improving air quality and Policy T7 Deliveries, servicing and construction). This is particularly important for development proposed for co-location with industrial uses and the intensification of industrial estates (see Part D4 of Policy E7 Industrial intensification, co-location and substitution). When considering co-location and intensification of industrial areas, boroughs should ensure that existing businesses and uses do not have unreasonable restrictions placed on them because of the new development.

3.13.5 Noise-generating **cultural venues** such as theatres, concert halls, pubs, night-clubs and other venues that host live or electronic music should be protected (see Policy HC5 Supporting London's culture and creative industries). This requires a sensitive approach to managing change in the surrounding area. Adjacent development and land uses should be brought forward and designed in ways which ensure established cultural venues remain viable and can continue in their present form without the prospect of licensing restrictions or the threat of closure due to noise complaints from neighbours.

3.13.6 As well as cultural venues, the **Agent of Change principle should be applied to all noise-generating uses and activities** including schools, places of worship, sporting venues, offices, shops, industrial sites, waste sites, safeguarded wharves, rail and other transport infrastructure.

3.13.7 Housing and other **noise-sensitive development** proposed near to an existing noise-generating use should include necessary acoustic design measures, for example, site layout, building orientation, uses and materials. This will ensure new development has effective measures in place to mitigate and minimise potential noise impacts or neighbour amenity issues. Mitigation measures should be explored at an early stage in the design process, with necessary and appropriate provisions secured through planning obligations.

3.13.8 Ongoing and longer-term management of mitigation measures should be considered, for example through a **noise management plan**. Policy T7 Deliveries, servicing and construction provides guidance on managing the impacts of freight, servicing and deliveries.

36 National Planning Policy Guidance, Ministy of Housing, Communities & Local Government, 2014, https://www.gov.uk/guidance/noise--2

3.13.9 Some **permitted development**, including change of use from office to residential, requires noise impacts to be taken into consideration by the Local Planning Authority as part of the prior approval process. Boroughs must take account of national planning policy and guidance on noise, and therefore the Agent of Change principle would apply to these applications.

3.13.10 **Noise and other impact assessments** accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the particular characteristics of existing uses can be properly captured and assessed. For example, some businesses and activities can have peaks of noise at different times of the day and night and on different days of the week, and boroughs should require a noise impact assessment to take this into consideration. Boroughs should pay close attention to the assumptions made and methods used in impact assessments to ensure a full and accurate assessment.

3.13.11 Reference should be made to Policy D14 Noise which considers the impacts of noise-generating activities on a wider scale and Policy SI 1 Improving air quality which considers the impacts of existing air pollution. **Further guidance** on managing and mitigating noise in development is also provided in the Mayor's London Environment Strategy.

Policy D14 Noise

A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

1) avoiding significant adverse noise impacts on health and quality of life
2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)

5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation

6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles

7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

B Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.

3.14.1 The **management of noise** is about encouraging the right acoustic environment, both internal and external, in the right place at the right time. This is important to promote good health and a good quality of life within the wider context of achieving sustainable development. The management of noise should be an integral part of development proposals and considered as early as possible. Managing noise includes improving and enhancing the acoustic environment and promoting appropriate soundscapes. This can mean allowing some places or certain times to become noisier within reason, whilst others become quieter. Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities, for example in relation to internationally important nature conservation sites which contain noise-sensitive wildlife species, or parks and green spaces affected by traffic noise and pollution. Boroughs, developers, businesses and other stakeholders should work collaboratively to identify the existing noise climate and other noise issues to ensure effective management and mitigation measures are achieved in new development proposals.

3.14.2 The **Agent of Change Principle** places the responsibility for mitigating impacts from existing noise-generating activities or uses on the new development. Through the application of this principle existing land uses should not be unduly affected by the introduction of new noise-sensitive uses. Regard should be given to noise-generating uses to avoid prejudicing their potential for intensification or expansion.

3.14.3 The management of noise also includes promoting **good acoustic design of the inside of buildings**. Section 5 of BS 8223:2014 provides guidance on how best to achieve this. The Institute of Acoustics has produced advice, Pro:PG Planning and Noise (May 2017), that may assist with the implementation of residential developments. BS4214 provides guidance on monitoring noise issues in mixed residential/industrial areas.

3.14.4 Deliberately **introducing sounds** can help mitigate the adverse impact of existing sources of noise, enhance the enjoyment of the public realm, and help protect the relative tranquillity and quietness of places where such features are valued. For example, playing low-level music outside the entrance to nightclubs has been found to reduce noise from queueing patrons, leading to an overall reduction in noise levels. Water features can be used to reduce the traffic noise, replacing it with the sound of falling water, generally found to be more pleasant by most people.[37]

3.14.5 Heathrow and London City Airport Operators have responsibility for noise action plans for airports. Policy T8 Aviation sets out the Mayor's approach to **aviation-related development.**

3.14.6 The definition of **Tranquil Areas, Quiet Areas and spaces of relative tranquillity** are matters for London boroughs. These are likely to reflect the specific context of individual boroughs, such that Quiet Areas in central London boroughs may reasonably be expected not to be as quiet as Quiet Areas in more residential boroughs. Defra has identified parts of Metropolitan Open Land and local green spaces as potential Quiet Areas that boroughs may wish to designate.[38]

37 For more information on approaches to minimise noise related to road and rail traffic, aircraft, water transport and industry see the Mayor's Environment Strategy

38 Noise Action Plan: Agglomerations Environmental Noise (England) Regulations 2006 (as amended), Department for Environment Food & Rural Affairs, 2014: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/276228/noise-action-plan-agglomerations-201401.pdf

Chapter 4

Housing

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Policy H1 Increasing housing supply

A Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.

B To ensure that ten-year housing targets are achieved, boroughs should:

1) prepare delivery-focused Development Plans which:
   a) allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification
   b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2
   c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.
2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:
   a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station[39] or town centre boundary[40]
   b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets
   c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses
   d) the redevelopment of surplus utilities and public sector owned sites
   e) small sites (see Policy H2 Small sites)
   f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support

39 Tube, rail, DLR and tram stations

40 District, major, metropolitan and international town centres – for the purposes of Policy H1 Increasing housing supply Part B2a, the 800m distance is measured from the edge of the town centre boundary

London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.

3) establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

C Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.

D Boroughs should publish and annually update housing trajectories based on the targets in Table 4.1 and should work with the Mayor to resolve any anticipated shortfalls.

E Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.

F On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.

4.1.1 The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified **need for 66,000 additional homes per year**. The SHMA covers overall housing need as well as exploring specific requirements for purpose-built student accommodation and specialist older persons' accommodation within the overall figure.

4.1.2 For the purposes of the Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The advantage of **strategic planning** is that it allows London to focus development in the most sustainable locations, allowing all of London's land use needs to be planned for with an understanding of how best to deliver them across the capital. Because of London's ability to plan strategically, boroughs are not required to carry out

their own housing needs assessment[41] but must plan for, and seek to deliver, the housing targets in this Plan. These have been informed by the SHLAA and the SHMA.

4.1.3 The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered. The London Plan, London Housing Strategy and Mayor's Transport Strategy together provide a framework to help achieve this ambition but achieving this step change in delivery will require increased levels of funding to support the delivery of housing and infrastructure, which is discussed in more detail in Chapter 11.

4.1.4 In particular, the **London Housing Strategy** sets out the Mayor's proposals for working with boroughs and other partners to deliver the step change in housing supply required, through:

- **proactive intervention in London's land market** to unlock and accelerate housing delivery, including on public land and through compulsory purchase and other forms of land assembly
- **increased and better-targeted investment** to de-risk development and maximise opportunities from new transport infrastructure
- **diversification of the housebuilding industry** through increased Build to Rent development, more support for small and medium-sized builders, and more supply from councils and housing associations
- **tackling the construction skills gap** and modernising construction methods.

4.1.5 The London Housing Strategy encourages boroughs to put in place clear plans to bring forward appropriate sites in their own ownership for housing delivery. Boroughs should align these plans with their Development Plans in order to speed up housing delivery and ensure planning policy implications are fully considered.

4.1.6 Also set out in the London Housing Strategy, is the Mayor's aim to ensure that Londoners have an opportunity to purchase new homes before they are marketed overseas – particularly those homes that ordinary Londoners are more likely to be able to afford. The Mayor is discussing with major homebuilders steps to make more new homes available to Londoners before anyone else. The Mayor would keep any such steps under review to ensure that they deliver his

41 Where boroughs wish to commission their own research on housing requirements to complement the London-wide SHMA, they are encouraged to do this on a sub-regional rather than single-borough basis.

objectives. Their effectiveness will be monitored and the Mayor will consider other measures if necessary.

4.1.7 **The ten-year housing targets** in Table 4.1 are based on the 2017 London SHLAA. This includes an assessment of large housing sites (0.25 hectares and above) undertaken in partnership with boroughs, which provides the most comprehensive study available of the capital's capacity for housing delivery based on a consistent pan-London methodology. In addition, the SHLAA includes an assessment of small site capacity using a combination of trend data for certain types of development and an estimate of potential for intensification in existing residential areas. The differences between borough housing targets are a reflection of the variations in the constraints and opportunities affecting development on large sites and the capacity for development on small sites.[42] This includes: transport connectivity; the availability of large brownfield sites; scope to accommodate higher residential densities around town centres and stations; planning designations for industrial land, Green Belt, Metropolitan Open Land and other protected open spaces; environmental constraints; heritage assets; and the need to accommodate other land uses.

4.1.8 The SHLAA shows that there is **capacity** across London for approximately 40,000 new homes a year on large sites. Modelling in the SHLAA also shows that there is capacity for development on small sites for 12,000 new homes a year. The allowance for windfall sites (that are not specifically identified) is considered appropriate given the policy framework set out in the London Plan; the capital's reliance on recycled brownfield sites in other active land uses; and the number of additional homes expected to be provided via incremental intensification of existing residential areas. Boroughs should identify as many sites, including small sites, as possible via their Development Plan Documents. However, because of the nature of some sites (as set out above), including the particular incremental characteristics of small sites, boroughs are supported in using windfall assumptions in their five-year housing trajectories based on the numbers set out in Table 4.2. This is because, in contrast with recent annual trends on small sites, the figures in Table 4.2 are considered to better reflect a minimum baseline for housing delivery given the policy focus on developing small sites for housing in this Plan (Policy H2 Small sites) and the package of measures outlined in the London Housing Strategy.

4.1.9 There will inevitably be variations in housing completions from one year to the next, as well as a degree of uncertainty in the delivery and phasing of large sites. Therefore, the Mayor will monitor both housing

42 For a full discussion of the SHLAA methodology and findings see 2017 SHLAA report.

completions and the net pipeline of approved homes when assessing progress towards delivering the London Plan housing targets (see Chapter 12 - Monitoring). The ten-year housing targets set out in Table 4.1 should be monitored in net terms taking into account homes lost through demolition, amalgamations[43] or change of use.[44] Net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. Net non-self-contained accommodation for older people (C2 Use Class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home. All other net non-self-contained communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home. The approach to **monitoring net housing provision** from different forms of non-self-contained accommodation is based on the amount of self-contained housing this form of supply will free up. The ratios for student accommodation and other forms of communal accommodation mirror the ratios set out in the Government's Housing Delivery Test Measurement Rulebook.

4.1.10 The Mayor will work closely with boroughs on their **housing trajectories** and Development Plans to ensure these targets are planned for effectively, particularly where issues are identified in terms of completions and the development pipeline. In order to effectively contribute towards meeting London's housing needs, it is essential that all permitted homes are built out in a timely manner. Boroughs should encourage ambitious and achievable build-out milestones for all development proposals and consider using tools such as viability reviews (see Policy H5 Threshold approach to applications). The increase in housing delivery required by these targets may be achieved gradually and boroughs are encouraged to set out a realistic and, where appropriate, stepped housing delivery target over a ten-year period. This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery.[45] With the support of the boroughs and taking account of the information published in accordance with Part D, the Mayor will monitor housing supply against targets on a London-wide basis.

43 Amalgamating flats into larger homes.

44 For example, a scheme involving 25 gross new homes and the loss of 10 existing homes would contribute 15 net additional homes towards meeting housing targets.

45 This would also fulfil the requirement of a 'Housing Delivery Test action plan'

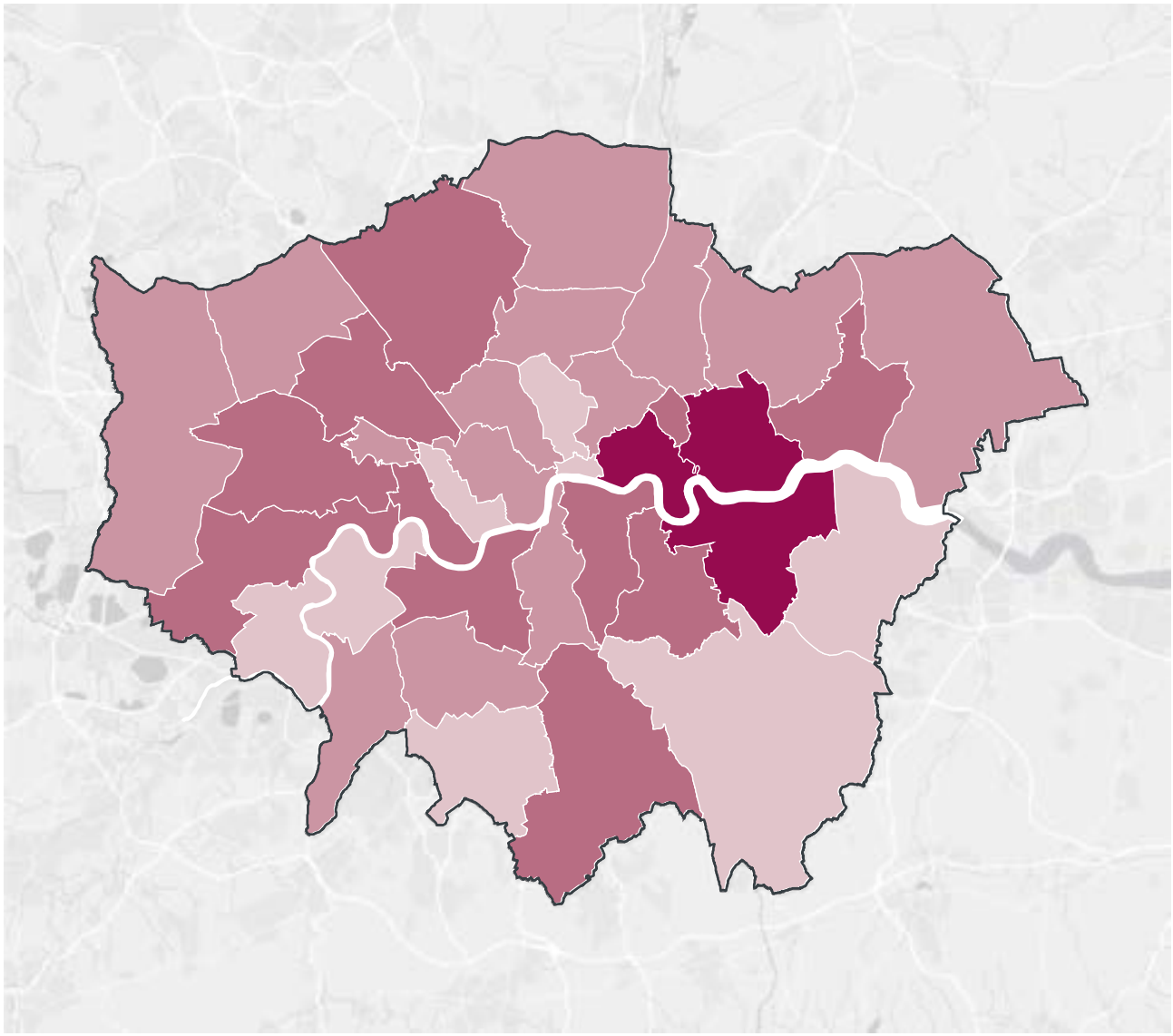
4.1.11 If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.

4.1.12 As identified in the Habitats Regulation Assessment, a mitigation strategy for Epping Forest Special Area of Conservation (SAC) is being produced to respond to the impact of additional recreational pressure and air pollution from nearby authorities, including some London boroughs. Should monitoring and evidence demonstrate adverse impacts on the SAC associated with development from London and following the implementation of the mitigation strategy, this will be considered as part of assessing whether a review of the London Plan is required. The GLA will engage with the relevant stakeholders on the formulation and delivery of the mitigation strategy.

Table 4.1 - 10 year targets for net housing completions (2019/20 -2028/29)

Planning Authority	Ten year housing target
Barking & Dagenham	19,440
Barnet	23,640
Bexley	6,850
Brent	23,250
Bromley	7,740
Camden	10,380
City of London	1,460
Croydon	20,790
Ealing	21,570
Enfield	12,460
Greenwich	28,240
Hackney	13,280
Hammersmith & Fulham	16,090
Haringey	15,920
Harrow	8,020
Havering	12,850
Hillingdon	10,830
Hounslow	17,820
Islington	7,750
Kensington & Chelsea	4,480
Kingston	9,640
Lambeth	13,350
Lewisham	16,670
London Legacy Development Corporation	21,540
Merton	9,180
Newham	32,800
Old Oak Park Royal Development Corporation	13,670
Redbridge	14,090
Richmond	4,110
Southwark	23,550
Sutton	4,690
Tower Hamlets	34,730
Waltham Forest	12,640
Wandsworth	19,500
Westminster	9,850
Total	**522,870**

Figure 4.1 - 10 Year Housing Target for Net Completions



10 Year Housing Target for Net Completions

- 24,001 - 34,730
- 16,001 - 24,000
- 8,001 - 16,000
- 1,460 - 8,000

Source: GLA Planning

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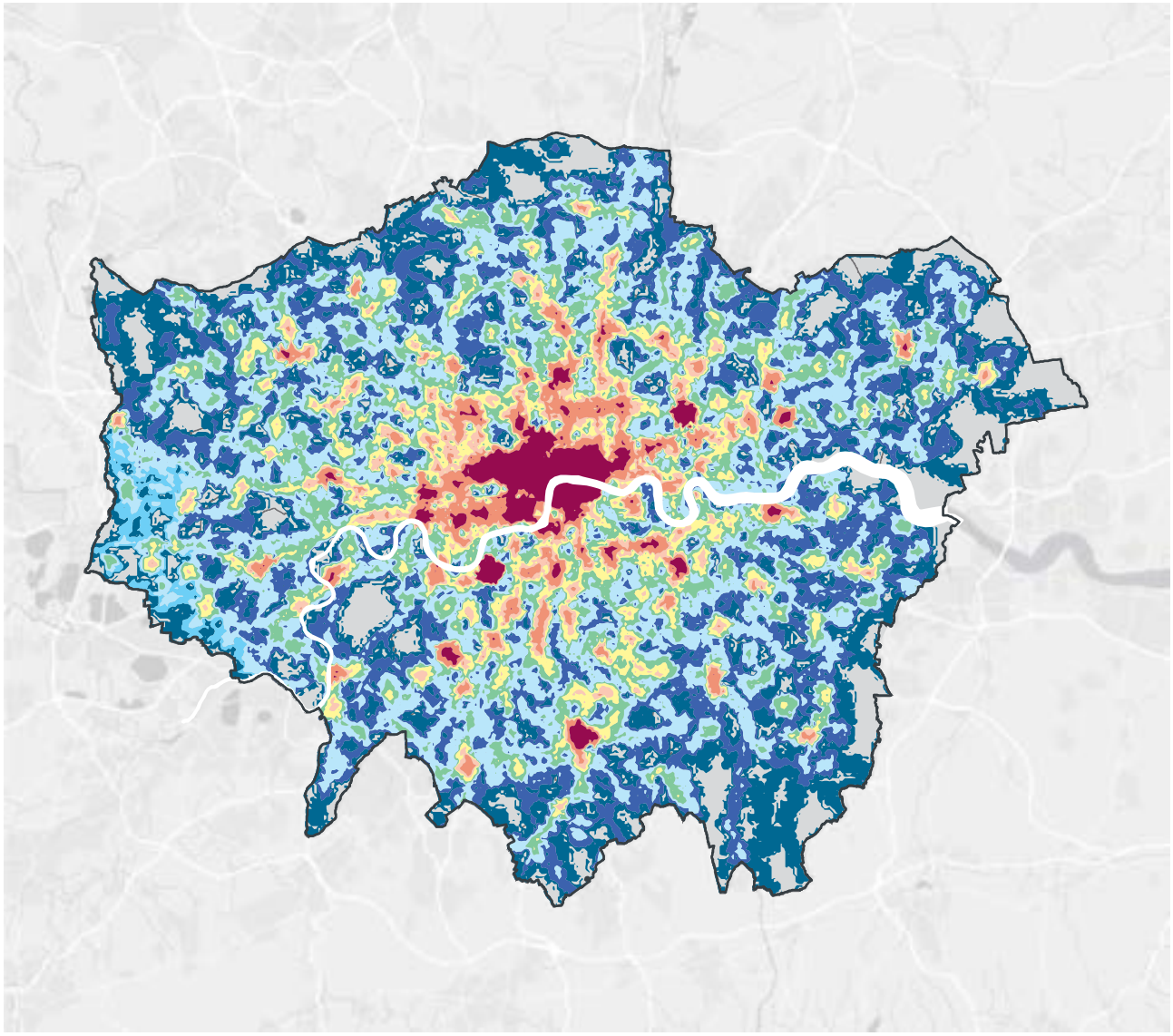
Figure 4.2 - Public Transport Access



Public Transport Access Levels
2021

- 0
- 1a
- 1b
- 2
- 3
- 4
- 5
- 6a
- 6b

Source: Transport for London (TfL)

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Policy H2 Small sites

A Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to:

1) significantly increase the contribution of small sites to meeting London's housing needs
2) diversify the sources, locations, type and mix of housing supply
3) support small and medium-sized housebuilders
4) support those wishing to bring forward custom, self-build and community-led housing
5) achieve the minimum targets for small sites set out in Table 4.2 as a component of the overall housing targets set out in Table 4.1.

B Boroughs should:

1) recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites
2) where appropriate, prepare site-specific briefs, masterplans and housing design codes for small sites
3) identify and allocate appropriate small sites for residential development
4) list these small sites on their brownfield registers
5) grant permission in principle on specific sites or prepare local development orders.

4.2.1 For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, **increasing the rate of housing delivery from small sites** is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.

4.2.2 Increasing housing output of this scale can also help to support a number of **related housing and planning policy objectives**. This includes:

- reviving the role of small and medium-sized developers in delivering new homes in London

- diversifying the sources, locations, type and mix of housing supply and the type of sites available in addition to large brownfield sites
- increasing housing provision in accessible parts of outer London to help address the substantial housing need in these areas and deliver market homes in more affordable price brackets
- providing opportunities for custom-build housing and community-led housing projects[46]
- supporting town centre economies
- as with large sites, providing opportunities to support the use of modern methods of construction.

4.2.3 The **small sites minimum targets** in Table 4.2 are informed by the 2017 London SHLAA and show the potential capacity for additional housing on sites of less than 0.25 hectares in size. The targets are based on trends in housing completions on sites of this size and the estimated capacity for net additional housing supply from intensification in existing residential areas, taking into account PTAL, proximity to stations and town centres, and heritage constraints. The small sites targets are a component of, and not additional to, the overall housing targets. The relative contribution from large and small sites in each borough may fluctuate across the target period, providing the overall 10 year borough target is met in a way that is consistent with the policies in the Plan. The small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by paragraph 70 of the National Planning Policy Framework of 2019.

4.2.4 **Incremental intensification** of existing residential areas within PTALs 3-6 or within 800m distance of a station[47] or town centre boundary[48] is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2. This can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. These developments should generally be supported where they provide well-designed additional housing to meet London's needs.

46 See Glossary

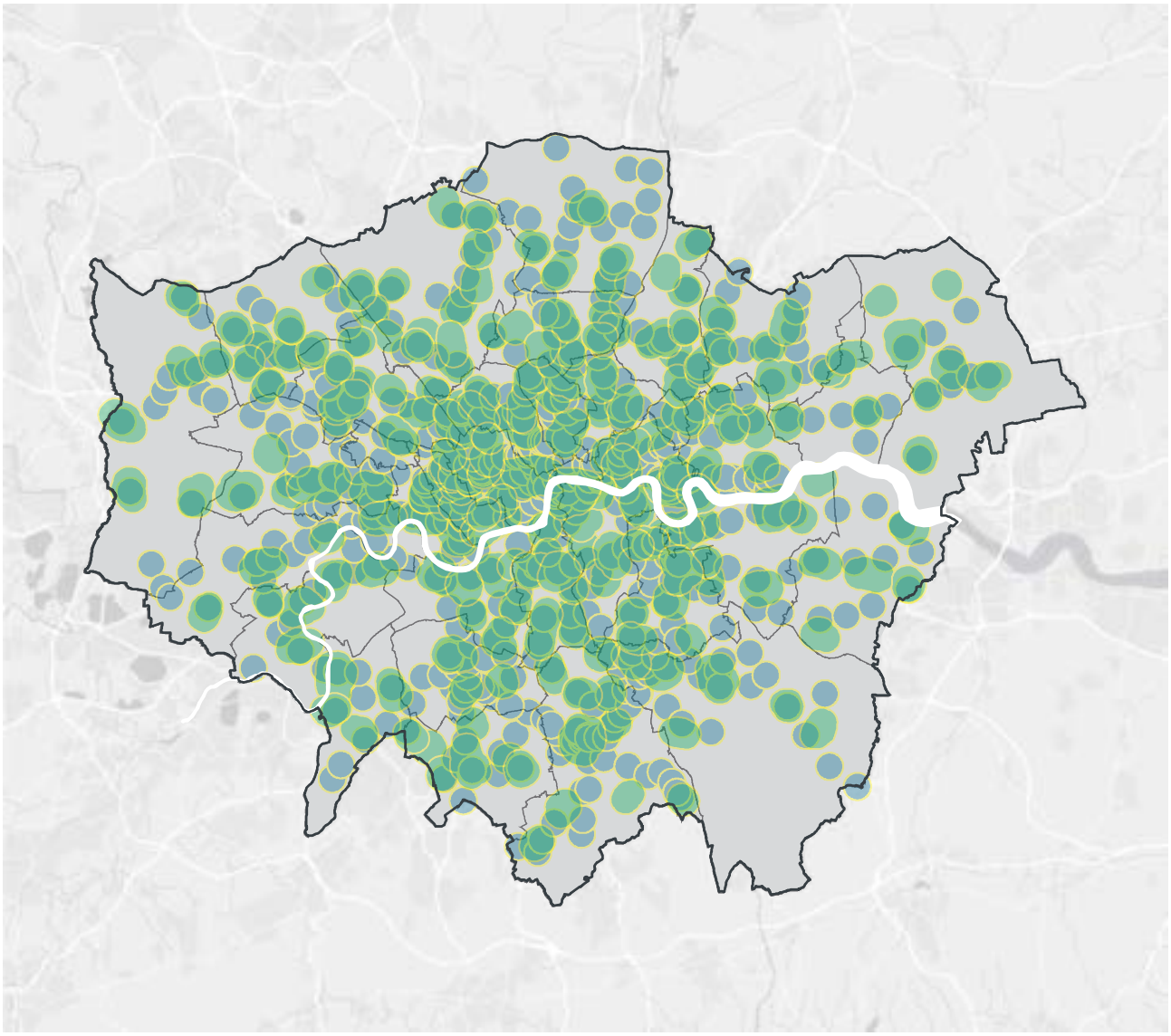
47 Tube, rail, DLR or tram station

48 District, major, metropolitan and international town centres

Table 4.2 - 10 year targets (2019/20 -2028/29) for net housing completions on small sites (below 0.25 hectares in size)

Planning Authority	Ten-year housing target
Barking & Dagenham	1,990
Barnet	4,340
Bexley	3,050
Brent	4,330
Bromley	3,790
Camden	3,280
City of London	740
Croydon	6,410
Ealing	4,240
Enfield	3,530
Greenwich	3,010
Hackney	6,580
Hammersmith & Fulham	2,590
Haringey	2,600
Harrow	3,750
Havering	3,140
Hillingdon	2,950
Hounslow	2,800
Islington	4,840
Kensington & Chelsea	1,290
Kingston	2,250
Lambeth	4,000
Lewisham	3,790
London Legacy Development Corporation	730
Merton	2,610
Newham	3,800
Old Oak Park Royal Development Corporation	60
Redbridge	3,680
Richmond	2,340
Southwark	6,010
Sutton	2,680
Tower Hamlets	5,280
Waltham Forest	3,590
Wandsworth	4,140
Westminster	5,040
Total	119,250

Figure 4.3 - Proximity to town centres and stations



Proximity to town centres and stations

- 800m distance to a underground, rail, DLR or tram station
- 800m distance to a district, major, metropolitan or international town centre

Source: Transport for London (TfL)

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4.2.5 The small sites target represents a small amount of the potential for intensification in existing residential areas, particularly in Outer London, therefore, they should be treated as minimums. To proactively increase housing provision on small sites through incremental development, Boroughs are encouraged to prepare **area-wide housing design codes**, in particular, for the following forms of development: residential conversions, redevelopment, extensions of houses and/or ancillary residential buildings.

4.2.6 The Mayor will set out design principles for housing developments on small sites across London in **design guidance**, which boroughs should draw on and supplement when preparing housing design codes. Housing design codes can be combined with local development orders, where appropriate. As a key purpose of housing design codes is to provide clarity and certainty for potential applicants, boroughs should support design proposals which accord with any published housing design code.

4.2.7 When assessing the benefits of additional housing provision, boroughs should recognise that schemes that provide relatively low numbers of new homes play an important cumulative role in helping to deliver housing targets alongside larger developments, subject to the scheme in question making the most efficient use of land.

4.2.8 Where existing houses are redeveloped or subdivided, boroughs may require the provision of **family-sized units** (3 bed + units) providing sufficient design flexibility is provided to allow the existing footprint of a house to be enlarged in order to meet this requirement. Where the amalgamation of separate flats into larger homes is leading to the sustained loss of homes and is not meeting the identified requirements of large families, boroughs are encouraged to resist this process.

4.2.9 Homes located on the ground floor on minor developments should meet the requirements of Policy D7 Accessible housing. Homes that are not on the ground floor on minor developments can comply with the M4(1) standard, which does not require step-free access, where provision of step-free access would be unfeasible.

4.2.10 Impacts on existing biodiversity or **green space**, as a result of minor housing developments, should be minimised and mitigated through measures such as returning hard standing to green space, the installation of green roofs and green walls, or the provision of landscaping that facilitates sustainable urban drainage in order to achieve the **principle of no net loss** of overall green cover.

4.2.11 Small sites can be particularly suitable for well-designed **community-led housing**[49] projects. Boroughs should support such projects where these developments are integrated with existing neighbourhoods and support mixed and inclusive communities.

Policy H3 Meanwhile use as housing

A Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development

4.3.1 Meanwhile uses are a range of temporary uses on land and property awaiting longer-term development. Some vacant land is suitable for meanwhile use as housing. To make efficient use of land that would otherwise be left vacant, boroughs are encouraged to identify sites that are suitable for residential occupation to be used for **meanwhile housing** including land in both public and private ownership. Opportunities for the meanwhile use of land for housing on large-scale phased developments should be identified during the planning process. The meanwhile use of a site for housing does not change the established land use of the site, and this should be made clear in the temporary planning permission. However, meanwhile housing should count towards meeting a borough's housing target.

4.3.2 The meanwhile use of a site must not result in an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. **Parameters** for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.

4.3.3 Meanwhile housing can be provided in the form of **precision-manufactured homes**. This can reduce construction time and the units can potentially be reused at a later date on another site.

4.3.4 The **time period** for meanwhile uses will vary and temporary permission may be renewed with consideration for site circumstances. Boroughs should consider starting the time period for the meanwhile use from the date of occupation rather than the date of planning permission, in order to support the viability and delivery of meanwhile housing developments.

49 See Glossary

Policy H4 Delivering affordable housing

A The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include:

1) requiring major developments which trigger affordable housing requirements[50] to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications)
2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided
3) all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of strategic partners[51]
4) public sector land[52] delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio
5) industrial land appropriate for residential use in accordance with Policy E7 Industrial intensification, co-location and substitution, delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.

B Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

50 All major development of 10 or more units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with Policy H2 Small sites

51 Strategic partners are affordable housing providers who commit to deliver ambitious development programmes through a flexible partnership with the Mayor. Each partnership involves at least 1,000 new housing starts, with at least 60 per cent of them genuinely affordable.

52 Separate affordable housing requirements apply to estate regeneration schemes on public sector land, which are set out in Policy H8 Loss of existing housing and estate redevelopment.

4.4.1 **Delivering more genuinely affordable housing**[53] is a key strategic issue for London. Meeting the need for circa 43,500 affordable homes per year, as established in the 2017 Strategic Housing Market Assessment, will require an increase in affordable housing contributions from all sources. All schemes are expected to maximise the delivery of affordable housing and make the most efficient use of available resources. This is critical to enabling London to meet the housing needs of its workforce and maintain the function and resilience of the city.

4.4.2 Past approaches have not adequately met levels of housing need. To provide greater certainty, speed up the planning process and increase affordable housing delivery, the Mayor is adopting a **threshold approach to viability**. This means that schemes meeting or exceeding the threshold without public subsidy,[54] and consistent with the requirements in Part C of Policy H5 Threshold approach to applications, are not required to submit viability information. The threshold approach was first introduced in the Mayor's Affordable Housing and Viability SPG. It provides the opportunity to move away from protracted viability debates, create certainty in terms of affordable housing requirements, embed the requirements into land values, and offer a clear incentive for developers to increase affordable housing delivered through the planning system above the level in planning permissions granted in recent years.

4.4.3 Schemes that do not meet this threshold, or require public subsidy to do so, will be required to submit detailed viability information which will be scrutinised and treated transparently. **Comprehensive review mechanisms** will be applied to schemes that do not meet the relevant threshold as set out in Part B of Policy H5 Threshold approach to applications, in order to ensure that affordable housing contributions are increased if viability improves over time.

4.4.4 Schemes are expected to deliver at least the threshold level of affordable housing without **grant or public subsidy** and to increase this proportion through the use of grant and other subsidy, where available. Only where there are clear barriers to delivery and it is fully justified through detailed viability evidence, in line with the methodology and assumptions set out in Policy H5 Threshold approach to applications and the Mayor's Affordable Housing and Viability SPG, should a lower level of affordable housing be considered.

53 The NPPF defines affordable housing for planning purposes. Within this broad definition, sections 4.6.3 - 4.6.9 of this Plan set out the Mayor's preferred affordable housing tenures and other genuinely affordable housing products

54 Public subsidy includes grant, public loans (including the Mayor's London Housing Bank) and any public land at a reduced cost

4.4.5 Given the extent of housing need identified for affordable housing in the 2017 SHMA, the delivery of overall housing targets should not be relied on as a reason for reducing affordable housing delivery or other policy requirements, subject to the approach in this policy, Policy H5 Threshold approach to applications and Policy DF1 Delivery of the Plan and Planning Obligations. In previous years where there has been a relaxation in affordable housing and other planning requirements this has typically led to higher land values, rather than an increase in housing delivery. Whilst the Plan sets out a clear approach for significantly increasing housing delivery in London, the London SHMA has identified that **65 per cent of London's need is for affordable housing**. Therefore, it is crucial that residential and mixed-use development contributes directly towards the provision of affordable housing and other policy requirements that support the delivery of sustainable development.

4.4.6 The Mayor expects all affordable housing providers to deliver as much affordable housing as possible. **Affordable housing providers with agreements with the Mayor** should deliver at least 50 per cent affordable housing across their development programme and, in the case of strategic partners, 60 per cent. Affordable housing commitments by these providers are not planning requirements that can be applied to individual sites as the commitments are only achievable if the affordable housing providers have the flexibility to use their resources strategically to maximise affordable housing provision across London.

4.4.7 **Public sector land** represents an opportunity to deliver homes that can meet the needs of London's essential workers who maintain the function and resilience of the city. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site. Public sector landowners with an agreement with the Mayor may provide 50 per cent affordable housing across a portfolio of sites provided at least 35 per cent affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35 per cent.

4.4.8 Most **industrial land** fulfils a vital role in supporting London's economy. However, it is occasionally deemed appropriate for residential uses. In these circumstances, there is potential for a significant difference in value between the two uses. The Mayor expects that residential proposals on industrial land should deliver at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.

4.4.9 Affordable housing should be delivered on site to help deliver mixed and inclusive communities providing choice to a range of Londoners. Affordable housing should only be accepted as an **off-site contribution** in exceptional circumstances where it can be robustly demonstrated that affordable housing

cannot be delivered on-site or where an off-site contribution would better deliver mixed and inclusive communities than an on-site contribution.

4.4.10 **Cash in lieu** contributions should be used in even more limited circumstances,[55] and only where there is detailed evidence to demonstrate that on-site affordable housing delivery is not practical, off-site options have been explored but are not acceptable and that accepting a cash in lieu contribution will not be detrimental to the delivery of mixed and inclusive communities.

4.4.11 In each case, the approach must result in **additional affordable homes**, meaning the funding should not be used for affordable units that would otherwise have been delivered. It should also take account of the fact that all sites are expected to deliver at least the threshold level of affordable housing and any cash in lieu or off-site contribution should deliver units in addition to this.

4.4.12 Cash in lieu contributions should be held in a **separate affordable housing pot**, where resources can be pooled and ring-fenced to enable greater, or more appropriate, new provision to be made off-site. This should either be on an identified site or as part of an agreed programme, in compliance with the statutory tests for use of planning obligations.[56]

4.4.13 To avoid incentivising off-site provision or in lieu contributions, agreements for this should provide no financial benefit to the applicant relative to on-site provision and should include **review mechanisms** in line with the Viability Tested Route. The policy target for schemes delivering off-site affordable housing or in lieu contributions is 50 per cent affordable housing provided across the main site and any linked sites when considered as a whole.

4.4.14 Boroughs must have in place **monitoring arrangements** to ensure that the additional homes are delivered. As per Policy H7 Monitoring of affordable housing, the Mayor requires information on off-site and cash in lieu delivery as part of the data collection for the Annual Monitoring Report.

55 For exceptions see Policy H2 Small sites and Policy H16 Large-scale purpose-built shared living.

56 Community Infrastructure Levy Regulations 2010, Regulation 122(2): http://www.legislation.gov.uk/uksi/2010/948/pdfs/uksi_20100948_en.pdf

Policy H5 Threshold approach to applications

A The threshold approach applies to major development proposals which trigger affordable housing requirements (see paragraph 4.5.15 for scheme types with bespoke approaches).

B The threshold level of affordable housing on gross residential development is initially set at:

1) a minimum of 35 per cent; or
2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or
3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.

C To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:

1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy
2) be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure)
3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.

D Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant.

E Fast tracked applications are not required to provide a viability assessment at application stage. To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be

triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough).

F Where an application does not meet the requirements set out in Part C it must follow the Viability Tested Route. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application:

1) the borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this Plan and the Affordable Housing and Viability SPG
2) viability tested schemes will be subject to:
    a) an Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough)
    b) a Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough)
    c) Mid Term Reviews prior to implementation of phases for larger phased schemes.

G Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPG.

Scheme amendments – Section 73 applications and deeds of variations

H For schemes that were approved under the Fast Track Route, and schemes determined before the threshold approach that would have qualified for the Fast Track Route, any subsequent applications to vary the consent will not be required to submit viability information, providing the resultant development continues to meet the relevant threshold and the criteria in Part C.

I For schemes where the original permission did not meet the threshold or required tenure split, including schemes determined before the threshold approach that would not have qualified for the Fast Track Route, viability information will be required where an application is submitted to vary the consent, and the borough or the Mayor where relevant, consider this would materially alter the economic circumstances of the scheme. Such cases will be assessed under the Viability Tested Route.

J Any proposed amendments that result in a reduction in affordable housing, affordability or other obligations or requirements of the original permission should be rigorously assessed under the Viability Tested Route. In such instances, a full viability review should be undertaken that reconsiders the value, costs, profit requirements and land value of the scheme.

K The Mayor should be consulted on any proposed amendments on referable schemes that change the level of affordable housing from that which was secured through the original planning

4.5.1 Applicants are strongly encouraged to take the **Fast Track Route** by providing the threshold level of affordable housing and meeting other Development Plan requirements to the satisfaction of the borough.

4.5.2 The **Viability Tested Route** will assess the maximum level of affordable housing that a scheme can deliver in cases where the threshold level of affordable housing cannot be met and where fixed or minimum affordable housing requirements are not in place. It is possible that, via the viability assessment using the detailed methodology in the SPG, a greater affordable housing contribution than the threshold level will be found to be viable and thus will be required.

4.5.3 The percentage of affordable housing on a scheme should be measured in **habitable rooms**[57] to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure the provision of affordable housing using **habitable floorspace.**[58] Applicants should present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison.

4.5.4 The thresholds set out in this policy have been informed by viability testing. This approach seeks to **embed affordable housing requirements into land values** and create consistency and certainty across London. The 35 per cent threshold level will be monitored and reviewed in 2021 to determine whether this threshold should be increased. Any changes to the threshold will be consulted on as part of an updated Affordable Housing and Viability SPG or through a focused review of the London Plan.

57 Habitable room is defined in the Glossary

58 Habitable floorspace is defined in the Glossary

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4.5.5 The Mayor recognises that **public sector land** can play a significant role in meeting affordable housing need. The threshold for public sector land (land that is owned or in use by a public sector organisation, or company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed) is set at 50 per cent to be considered under the Fast Track Route. This is because these sites represent an opportunity to meet a range of objectives, including making better use of sites, improving services and delivering more affordable housing. Moreover, as public assets, these landholdings should be used to deliver development and outcomes that are most needed by – and matter most to – the public.

4.5.6 Public sector land also represents an opportunity to deliver homes that can meet the needs of London's essential workers who maintain the function and resilience of the city, such as those working in health, fire, police, transport and support services. Where there is an agreement with the Mayor to deliver at least 50 per cent across the portfolio of sites, then the **35 per cent threshold should apply to individual sites.**

4.5.7 Given the difference in values between **industrial** and residential development, residential development proposals that would result in a net loss of industrial floorspace capacity[59] on Strategic Industrial Locations, Locally Significant Industrial Sites or Non-Designated Industrial Sites are expected to provide at least 50 per cent affordable housing to follow the Fast Track Route. If this is not possible, detailed viability evidence will be needed to justify a lower level of affordable housing.

4.5.8 Where the level of affordable housing offered meets the criteria of Part C, this should normally be considered as meeting the maximum amount of affordable housing which can be delivered through Section 106 (subject to an Early Stage Review Mechanism).

4.5.9 Where a scheme meets the threshold level of affordable housing, but the borough, and/or the Mayor where relevant, are not satisfied that the other

59 Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio, whichever is the greater. For the purposes of Policy H5 Threshold approach to applications, this floorspace-based approach applies to sites used for utilities infrastructure or land for transport functions that are no longer required. However, it is recognised that some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available.

relevant Development Plan requirements and or obligations for the scheme are met, then the applicant can be asked to provide detailed viability information and be required to follow the **Viability Tested Route**.

4.5.10 To incentivise schemes with a high proportion of genuinely affordable housing, schemes that propose **75 per cent or more genuinely affordable housing** may be considered under the Fast Track Route whatever the affordable housing tenure mix, where supported by the borough and, where relevant, the Mayor. This should be determined on a case-by-case basis having regard to the housing need met by the scheme and the level of public subsidy involved.

4.5.11 All schemes are expected to maximise the delivery of genuinely affordable housing and make the most efficient use of available resources to achieve this objective. Where **grant or other public subsidy** is available and would increase the proportion of affordable housing, this should be utilised. The higher proportion of affordable housing should be set out in the Section 106 agreement as being subject to grant availability, alongside the proportion viable without grant. Funding will be available on a tariff basis, details of which are set out in the Mayor's Homes for Londoners: Affordable Homes Programme 2016-23.[60] Applications for schemes of 150 units or more must evidence that they have sought grant to increase levels of affordable housing. Generally, this will be through evidenced discussions with the local authority and registered providers of social housing. Further detail is provided in the Affordable Housing and Viability SPG.

4.5.12 The Mayor has provided detailed **guidance on viability assessments** in his Affordable Housing and Viability SPG. This is a material planning consideration for planning applications in London. The Mayor will follow this guidance on referable applications and strongly encourages boroughs to follow it for all applications. Providing a standardised approach helps streamline the system and reduces uncertainty. The aim of a viability assessment is to establish whether the proposed level of affordable housing and other contributions are the maximum that can be reasonably supported or whether further obligations or a greater level of policy compliance could be achieved.

4.5.13 The **Existing Use Value Plus** (EUV+) approach to determining the benchmark land value is based on the current use value of a site plus an appropriate site premium. The benefit of this approach is that it clearly identifies the uplift in value arising from the grant of planning permission because it enables comparison with the value of the site without planning permission. The EUV+

60 https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners-affordable-homes-programmes

approach is usually the most appropriate approach for planning purposes. It can be used to address the need to ensure that development is sustainable in terms of the NPPF and Development Plan requirements, and in most circumstances the Mayor will expect this approach to be used. An alternative approach should only be considered in exceptional circumstances which must be robustly justified by the applicant and/or the borough in line with the Mayor's SPG.

4.5.14 **Viability Review mechanisms** should be applied to all viability tested applications at early and late stages in the development process (and mid-term reviews in the case of longer phased schemes) to ensure that affordable housing delivery is maximised as a result of any future improvement in viability. Further guidance is provided in the Affordable Housing and Viability SPG.

4.5.15 Some schemes are not suitable to follow the Fast Track Route. These schemes must follow the **Viability Tested Route**. This includes:

- applications which propose affordable housing **off-site or a cash in lieu contribution** (as set out above)
- applications for schemes that involve the **demolition of existing affordable dwellings** which should follow the approach set out in Policy H8 Loss of existing housing and estate redevelopment
- schemes claiming the **vacant building credit.**

4.5.16 Policy H11 Build to Rent, Policy H13 Specialist older persons housing, Policy H15 Purpose-built student accommodation and Policy H16 Large-scale purpose-built shared living set out specific affordable housing approaches in those types of development.

Policy H6 Affordable housing tenure

A The following split of affordable products should be applied to residential development:

1) a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership

3) the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.

B To follow the Fast Track Route the tenure of 35 per cent of homes must meet the requirements set out in Part A. The Fast Track Route is also available to applicants that elect to provide low-cost rented homes in place of intermediate homes, provided the relevant threshold level is reached. Where affordable homes are provided above 35 per cent, their tenure is flexible, provided the homes are genuinely affordable (defined in Part A1 and Part A2), and should take into account the need to maximise affordable housing provision, along with any preference of applicants to propose a particular tenure.

4.6.1 The 2017 SHMA shows London's significant need for low-cost rental housing; however, the current national funding programme is focused on intermediate products which limits the Mayor's ability to require higher levels of low-cost rented accommodation. The **tenure splits** set out in this policy provide sufficient flexibility to be tailored to meet local needs as well as ensuring that new development delivers a minimum level of low-cost rented accommodation and intermediate accommodation, contributing to the delivery of mixed and inclusive communities. The minimums in Part A1 and Part A2 will be monitored and reviewed in 2021 and, if necessary, updated through Supplementary Planning Guidance, taking account of future affordable housing funding agreements.

4.6.2 There is a presumption that the **40 per cent to be decided by the borough** will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London. However, it is recognised that for some boroughs a broader mix of affordable housing tenures will be more appropriate either because of viability constraints or because they would deliver a more mixed and inclusive community. The appropriate tenure split should be determined through the Development Plan process or through supplementary guidance.

4.6.3 The Mayor is committed to delivering genuinely affordable housing. Within the broad definition of affordable housing, the Mayor's **preferred affordable housing tenures** are:

- homes based on social rent levels, including Social Rent and London Affordable Rent
- London Living Rent

- London Shared Ownership.

These are described in more detail below.

4.6.4 **London Affordable Rent** and Social Rent homes are for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The rent levels for Social Rent homes use a capped formula and London Affordable Rent homes are capped at benchmark levels published by the GLA. Rents for both are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF. More detail is contained within the Mayor's Homes for Londoners Affordable Homes Programme funding guidance[61]. These homes will be allocated in accordance with need (based on the borough's allocations policy).

4.6.5 **London Living Rent** (LLR) offers Londoners on average incomes a lower rent, enabling them to save for a deposit. The Mayor is introducing LLR as an intermediate affordable housing product with low rents that vary by ward across London. Where funded by the Greater London Authority, LLR will be a Rent to Buy product, with sub-market rents on time-limited tenancies, which will help households on average income levels to save for a deposit. As London Living Rent can be a step to homeownership, it can be considered as an affordable homeownership product.[62]

4.6.6 **London Shared Ownership** is an intermediate ownership product which allows London households who would struggle to buy on the open market, to purchase a share in a new home and pay a low rent on the remaining, unsold, share.

4.6.7 **Other affordable housing products** may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the London Housing Strategy[63] definition of genuinely affordable housing and are considered by the borough to be genuinely affordable.

4.6.8 Currently all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000. Intermediate ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the definition of affordable housing), should be affordable to households on incomes of up to £90,000. Further information on the **income caps** and how they are applied can be found

61 https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners-affordable-homes-programmes

62 Further details on LLR can be found in the London Housing Strategy

63 Mayor of London, 2018, London Housing Strategy: https://www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf

in the Annual Monitoring Report. The caps will be reviewed and updated where necessary in the Annual Monitoring Report.

4.6.9 For dwellings to be considered affordable, **annual housing costs**, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of net household income, based on the household income limits set out above. Boroughs should seek to ensure that intermediate provision provides for households with a range of incomes below the upper limit. For London Living Rent – please refer to the rent setting guidance provided on the GLA website.

4.6.10 In addition to the income caps, boroughs may set **other eligibility criteria** for the intermediate units, reflecting local housing need. However, any local criteria including income caps below the maximum amounts set out above, should automatically cascade out to the London-wide eligibility criteria within three months to ensure that units are not left vacant. Re-sales and re-lets should be available to those meeting the London-wide income caps and not be restricted by local eligibility criteria. Homes should be made available through the new Homes for Londoners online portal.

4.6.11 To follow the Fast Track Route, the tenure of 35 per cent of homes must adhere to the **tenure split** set out in Policy H6 Affordable housing tenure. Where a scheme is delivering more than 35 per cent, the tenure of the additional affordable housing is flexible and should take into account the need to maximise affordable housing provision along with any preference of applicants to propose a particular tenure.

4.6.12 If, when assessing a scheme under the Viability Tested Route, the evidence demonstrates that the threshold cannot be met, the affordable housing tenure split in Policy H6 Affordable housing tenure should be considered as the starting point for negotiations. It will, however, be for the borough, and the Mayor where relevant, to decide if there should be a greater number of affordable homes, or fewer homes at a deeper discount. Therefore Section106 agreements should stipulate the **tenure mix** for a scheme and this should be consistent with the assumptions in the viability assessment.

Policy H7 Monitoring of affordable housing

A Boroughs are required to have clear monitoring processes to ensure that the affordable housing secured on or off site is delivered and recorded in line with the Section 106 agreement.

B Monitoring processes should ensure that any cash in lieu payments are used to deliver additional affordable housing.

C Boroughs should ensure that where a review mechanism is triggered, it is implemented and the number of extra homes delivered, or cash in lieu secured, is recorded.

D Boroughs must publish monitoring information on Parts A – C annually to ensure transparency in the planning process and so the public know how funds are being spent. This information should be shared with the GLA so it can be part of the annual monitoring process.

4.7.1 Policy H4 Delivering affordable housing, Policy H5 Threshold approach to applications and Policy H6 Affordable housing tenure set out the approach to affordable housing delivery in London. It is crucial that the implementation of Section 106 agreements and the outcome of review mechanisms are monitored. Policy H7 Monitoring of affordable housing will ensure that boroughs have **monitoring processes** in place to implement Section 106 agreements and that the information is in the public domain.

Policy H8 Loss of existing housing and estate redevelopment

A Loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.

B Loss of hostels, staff accommodation and shared and supported accommodation that meet an identified housing need should be satisfactorily re-provided to an equivalent or better standard.

Demolition and replacement of affordable housing

C Before considering the demolition and replacement of affordable homes, boroughs, housing associations and their partners should always consider

alternative options first. They should balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of Mayoral funding and any conditions attached to that funding.

D Demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities.

E All development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace

4.8.1 It is important that existing homes of all tenures are well-maintained and are of good quality as these will continue to house the majority of Londoners. However, the **redevelopment and intensification** of London's existing housing has played, and will continue to play, an important role in the evolution of London. The benefits of development proposals that involve the demolition and replacement of existing homes should be balanced against any potential harm.

4.8.2 Parts C, D and E of this policy concern the **redevelopment of social housing estates**. This will generally occur as part of a wider process of estate regeneration, some elements of which fall beyond the remit of the London Plan. The Mayor's Good Practice Guide to Estate Regeneration provides detailed guidance for assessing appropriate approaches to estate regeneration. In particular, only once the objectives of an estate regeneration scheme have been formulated in consultation with residents, should the physical interventions required to achieve them be considered. The approach taken will differ from project to project, depending on factors that include: the existing characteristics and quality of an estate; the financial resources available; any regeneration or redevelopment plans that affect the wider area; and the wishes of residents and other stakeholders.

4.8.3 The range of physical interventions that may be required to support the delivery of estate regeneration projects include: repairs to, and refurbishment of, existing homes; building new homes on 'infill' sites; and demolition and redevelopment. Different schemes will require different interventions, or a combination of some or all of the above – there is no 'one size fits all' approach. In the Good Practice Guide, the Mayor is clear that when considering options to deliver estate regeneration projects, boroughs, housing associations and their partners should **always consider alternative options to demolition first**. They should balance the potential benefits of demolishing and rebuilding homes against the wider social and environmental impacts of this option.

4.8.4 Regardless of whether an estate regeneration project includes the demolition and replacement of affordable homes, it is important that all such schemes are delivered with existing and new residents and communities in mind. All proposals for such schemes should take account of the requirements of the **Mayor's Good Practice Guide** to Estate Regeneration (2018) and the requirement for a ballot of residents when accessing Mayoral funding for schemes that involve demolition.

4.8.5 Estate regeneration that involves the loss and replacement of affordable housing should deliver an **uplift in affordable housing** wherever possible. Therefore, all such estate regeneration schemes must go through the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing. For the purposes of this policy, existing affordable housing floorspace includes both occupied and vacant floorspace regardless of the current condition of the stock.

4.8.6 Where an affordable housing provider is redeveloping an estate as part of a **wider programme** then it may be possible to re-provide a different mix of affordable housing on the estate (taking account of the wishes of people who want to return to the estate) if the overall level of provision is maintained across the programme and where the approach is acceptable to the borough and, where relevant, the Mayor (further guidance is provided in the Affordable Housing and Viability SPG). The Mayor will closely scrutinise proposals and will only agree to them where he is certain that the housing is being genuinely re-provided and that no better option is available. Given the impact of estate regeneration schemes on existing residents, it is particularly important that information about the viability of schemes is available to the public even where a high level of affordable housing is being delivered

Policy H9 Ensuring the best use of stock

A Boroughs should promote efficient use of existing housing stock to reduce the number of vacant and under-occupied dwellings.

B The Mayor will support boroughs with identified issues of new homes being left empty, sometimes known as 'buy to leave' properties, to put in place mechanisms which seek to ensure new homes are occupied.

C Boroughs should take account of the impact on housing stock and local housing need when considering applications for a change of use from housing to short stay holiday rental accommodation to be used for more than 90 days a year.

D Boroughs should take account of the role of houses in multiple occupation (HMOs) in meeting local and strategic housing needs. Where they are of a reasonable standard they should generally be protected.

4.9.1 Given the pressure for housing and competition for land in London for a variety of uses, it is important to ensure that new homes meet an identified need and are not left vacant long-term (over six months). While the number of **long-term vacant properties** in London has decreased significantly, and is now below one per cent of the housing stock,[64] to make best use of existing stock, where vacant properties are identified, local authorities should investigate why the units are vacant and where possible seek to bring them back into use. Boroughs should levy the council tax empty homes premium to incentivise occupation of vacant properties. Boroughs are encouraged to use all the tools at their disposal such as Empty Dwelling Management Orders to bring long-term vacant stock back into use as affordable housing. Boroughs should also ensure a range of new homes are provided that meet the needs of those who wish to downsize, and that tenants in affordable homes are supported to downsize where they wish to do so.

4.9.2 A recent phenomenon in some parts of London has seen a proportion of new homes being purchased by investors who rely solely on capital appreciation for their returns. New homes purchased for this purpose are sometimes known as **'buy to leave'**. Although GLA evidence suggests this practice is not particularly

64 Table 615 from https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants

widespread, where it does happen it reduces the amount of new housing stock being occupied by households in need. Where the practice is widespread in a new building it can also negatively affect the provision of services to tenants.

4.9.3 It is unlawful for homes in greater London to be used **as short-term holiday rented accommodation** for a cumulative period of more than 90 days a year without seeking planning permission.[65] The use of dwellings as short-term holiday rentals can have a detrimental impact on neighbours' residential amenity and community cohesion in the wider area where concentrated in a particular location. The use also reduces the supply of homes available for people to live in.

4.9.4 **Houses in multiple occupation** (HMOs) are an important part of London's housing offer, reducing pressure on other elements of the housing stock. Their quality can, however, give rise to concern. Where they are of a reasonable standard they should generally be protected and the net effects of any loss should be reflected in Annual Monitoring Reports. In considering proposals which might constrain this provision, including Article 4 Directions affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as local importance of HMOs.

Policy H10 Housing size mix

A Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:

1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment
2) the requirement to deliver mixed and inclusive neighbourhoods
3) the need to deliver a range of unit types at different price points across London
4) the mix of uses in the scheme
5) the range of tenures in the scheme

65 Pursuant to the Deregulation Act 2015 (sections 44 and 45: Short-term use of London accommodation: relaxation of restrictions and power to relax restrictions.): http://www.legislation.gov.uk/ukpga/2015/20/pdfs/ukpga_20150020_en.pdf

6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
7) the aim to optimise housing potential on sites
8) the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock
9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

B For low-cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of:

1) evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households
2) other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation
3) the impact of welfare reform
4) the cost of delivering larger units and the availability of grant.

4.10.1 The 2017 London Strategic Housing Market Assessment (SHMA) estimated the **unit size mix of new homes** required to meet London's current and projected housing needs using three different scenarios, the results of which are set out in the SHMA report addendum. The main factors influencing this size mix include the projected growth in different household types, assumptions about under-occupation, and the substantial number of overcrowded households in London, whose needs can be addressed by providing family-sized homes but also smaller homes for concealed households to move into. Boroughs can draw on the scenarios in the SHMA to understand housing mix requirements or to inform local assessments. While the SHMA identifies the full range of needs between 2016 and 2041, boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units of particular sizes.

4.10.2 Policy H10 Housing size mix sets out all the issues that applicants and boroughs should take into account when considering the **mix of homes on a**

site. Boroughs are encouraged to set out the preferred housing size mix (for all tenures) as part of a site allocation, ensuring that the housing size mix is determined in accordance with Parts A and B. It should be noted that in terms of delivering mixed and inclusive communities, a neighbourhood may currently have an over-concentration of a particular size of unit and a new development could help redress the balance.

4.10.3 Well-designed **one- and two- bedroom units** in suitable locations can attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development.

4.10.4 **One-bedroom units** play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes. However, one-person and one-bed units are the least flexible unit type so schemes should generally consist of a range of unit sizes.

4.10.5 As part of their housing strategy functions, local authorities are required to have an understanding of housing needs in their area (for example, as set out in a Strategic Housing Market Assessment) and this, along with their local Housing Register, will provide the evidence for the **size of low-cost rented homes** (in terms of number of bedrooms) required to meet identified need. Combined with the considerations set out in Part A, this information should inform local policy or guidance about the size (in terms of number of bedrooms) of low-cost rented units expected on a development. This clarity about the unit size mix for affordable homes, taken together with the threshold approach to affordable housing, will help ensure that applicants and landowners understand the cost implications of overall affordable housing requirements when formulating development proposals and purchasing land. Boroughs should take account of the availability of grant funding when producing guidance or policy on this issue.

4.10.6 The impact of this policy on the mix of homes in terms of numbers of bedrooms approved across London will be carefully **monitored and assessed** as part of the Annual Monitoring Report process. This will highlight any adverse impacts and identify if any revisions are necessary to the policy.

Policy H11 Build to Rent

A Where a development meets the criteria set out in Part B, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity.

B To qualify as a Build to Rent scheme the following criteria must be met:

1) the development, or block or phase within the development, has at least 50 units[66]
2) the homes are held as Build to Rent under a covenant for at least 15 years[67]
3) a clawback mechanism is in place that ensures there is no financial incentive to break the covenant
4) all the units are self-contained and let separately
5) there is unified ownership and unified management of the private and Discount Market Rent elements of the scheme
6) longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months
7) the scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked
8) there is on-site management. This does not necessarily mean full-time dedicated on-site staff, but that all schemes need to have systems for prompt resolution of issues and some daily on-site presence
9) providers have a complaints procedure in place and are a member of a recognised ombudsman scheme

66 Boroughs may set their own thresholds to reflect local housing market circumstances and affordable housing need. However, it is important that where a lower threshold is set, Build to Rent schemes must still operate according to the stipulations in this guidance in order to qualify for the application of the Built to Rent policy.

67 Covenant periods are expected to increase as the market matures.

10) providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

C To follow the Fast Track Route, Build to Rent schemes must deliver at least 35 per cent affordable housing, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution. The Mayor expects at least 30 per cent of DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70 per cent at a range of genuinely affordable rents.[68] Schemes must also meet all other requirements of Part C of Policy H5 Threshold approach to applications.

D Where the requirements of C above are not met, schemes must follow the Viability Tested Route set out in Policy H5 Threshold approach to applications. Viability assessments on such schemes should take account of the differences between Build to Rent and Build for Sale development and be undertaken in line with the Affordable Housing and Viability SPG.

E On schemes that propose a proportion of homes as Build to Rent and a proportion for sale to the market, Part A of this policy will only be suitable for the Build to Rent element. The scheme should be assessed as a whole, with affordable housing calculated as a proportion of total habitable rooms across the scheme.

68 Boroughs may publish guidance setting out the proportion of DMR homes to be provided at different rental levels to benefit from the Fast Track Route. In setting local DMR requirements boroughs should have regard to the relationship between the level of discount required and the viability of achieving the relevant threshold level.

4.11.1 Boroughs should take a **positive approach to the Build to Rent sector** to enable it to better contribute to the delivery of new homes. Build to Rent developments can make a positive contribution to increasing housing supply and are beneficial in a number of ways. They can:

- attract investment into London's housing market that otherwise would not exist
- accelerate delivery on individual sites as they are less prone to 'absorption constraints'[69] on build-out rates
- deliver more readily across the housing market cycle as they are less impacted by house price downturns
- provide a more consistent and at-scale demand for off-site manufacture
- offer longer-term tenancies and more certainty over long-term availability
- ensure a commitment to, and investment in, place-making through single ownership
- provide better management standards and better quality homes than much of the mainstream private rented sector.

4.11.2 The **Build to Rent Policy** has been developed in recognition of the fact that Build to Rent operates a different model to Build for Sale. Build to Rent relies on income through rent over a number of years, rather than an upfront return on sales (this is often referred to as the 'distinct economics' of the sector). Because of this, in some circumstances Build to Rent may not be able to compete for land on an equal footing with speculative Build for Sale, as it may generate lower initial land values. Longer term, however, Build to Rent is an attractive offer to institutional investors. This policy provides a specific approach to the affordable housing offer, where the aim is to maintain the integrity of the Build to Rent development, with unified ownership and management of all the homes.

4.11.3 Where a developer is proposing a Build to Rent development which meets the definition set out in Part B, the affordable housing offer can be entirely **Discounted Market Rent** (DMR), managed by the Build to Rent provider and delivered without grant, i.e. entirely through planning gain. As it is not a requirement to be a local authority or a Registered Provider to deliver or manage intermediate rented homes that are delivered without grant, these units can be owned and/or managed by Build to Rent landlords themselves. DMR units should

69 The absorption rate is how long it will take a home to sell or be let for the identified price. The main constraint on absorption is the number of buyers or renters in the market willing (or able) to buy or rent the property at the identified price.

be fully integrated into the development with no differences between DMR and market units.

4.11.4 The Mayor's strong preference is for DMR homes to be let at **London Living Rent** level, to ensure city-wide consistency in approach. Unlike other DMR products, London Living Rent has an advantage in that it has a London-wide electoral mandate, can be consistently understood and applied across London, can earn the public's trust as being genuinely affordable, and will be backed by the GLA who will uprate it every year. DMR should be allocated according to intermediate eligibility criteria, which can include locally defined eligibility criteria. Where the borough has an intermediate or DMR waiting list they should agree with the applicant a process for providing priority access to the DMR units for those on the waiting list.

4.11.5 A threshold level of affordable housing has been introduced to provide an opportunity for Built to Rent schemes to take advantage of the Fast Track Route offered to Build for Sale schemes.

4.11.6 To follow the **Fast Track Route** schemes should provide the threshold level of DMR homes with at least 30 per cent let at London Living Rent levels. The remainder should be provided at a range of genuinely affordable discounts below market rent based on local need to be agreed with the borough and Mayor where relevant. The thresholds and required discounts to market rent will be reviewed and if necessary updated in 2021 through Supplementary Planning Guidance.

4.11.7 Proposals that do not provide 35 per cent affordable housing at the required discount to market rents, or 50 per cent on public sector land, or 50 per cent on industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity, or that do not meet the criteria of Part C of Policy H5 Threshold approach to applications will be subject to the **Viability Tested Route** under Part E of Policy H5 Threshold approach to applications.

4.11.8 In all cases the borough must ensure that the DMR units fully meet the definition of **intermediate housing** and are affordable to those eligible for intermediate rented housing in London, taking into account the Mayor's guidance on this issue.

4.11.9 Schemes that do not meet the Build to Rent definition set out in Part B and that do not provide a 15-year covenant or a clawback agreement in line with the Mayor's guidance will not qualify for the Build to Rent policy approach. These will be treated as **Build for Sale** developments for the purposes of determining affordable housing requirements.

4.11.10 Where justified in a Development Plan, boroughs can require a proportion of affordable housing as **low-cost rent** (social rent or London Affordable Rent see 4.6.4) on Build to Rent schemes in accordance with Part A of Policy H6 Affordable housing tenure. Low-cost rent homes must be managed by a registered provider. The low-cost rent affordable housing would contribute towards the relevant threshold required to meet the fast track route, as set out in paragraph 4.11.6. DMR is an intermediate product and is managed and allocated as such, therefore it is not appropriate to seek DMR at or close to social rent levels.

4.11.11 Schemes that qualify for the Fast Track Route will not need to provide a full viability assessment but will be subject the **15-year covenant and clawback** given the Build to Rent policy approach to affordable housing.[70]

4.11.12 The majority of DMR products, where they meet the requirements of the Community Infrastructure Levy (CIL) regulations qualify for **mandatory CIL relief.**[71]

4.11.13 Further **support for Build to Rent** can be given by boroughs through:

- allocating specific sites for Build to Rent or requiring an element of Build to Rent on larger sites in order to accelerate build out of the site
- encouraging long-term institutional investment, working with the GLA and partners
- supporting institutional investment on public sector land, including exploring the use of joint ventures or deferred receipts.

4.11.14 Further guidance on Build to Rent schemes can be found in the Mayor's Affordable Housing and Viability SPG.

70 A valuation of the market and affordable units must be included within the S106 agreement to enable the level of clawback to be calculated in the event that the covenant is broken.

71 The Community Infrastructure Levy (Amendment) Regulation 2015 – amendment to Part 6 – exemptions and reliefs.

Policy H12 Supported and specialised accommodation

A The delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. The form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London's population, including disabled Londoners (see Policy D7 Accessible housing) within a wider inclusive community setting. Boroughs should undertake assessments of the need for short-term, medium-term and permanent supported and specialised accommodation within their borough. Supported and specialised accommodation could include:

1) accommodation for people leaving hostels, refuges and other supported housing, as well as care leavers and people leaving prison to enable them to live independently
2) accommodation for young people with support needs
3) reablement accommodation (intensive short-term) for people who are ready to be discharged from hospital but who require additional support to be able to return safely to live independently at home, or to move into appropriate long-term accommodation
4) accommodation for disabled people (including people with physical and sensory impairments and learning difficulties) who require additional support or for whom living independently is not possible
5) accommodation (short-term or long-term) for people with mental health issues who require intensive support
6) accommodation for rough sleepers
7) accommodation for victims of domestic abuse
8) accommodation for victims of violence against women and girls

4.12.1 In undertaking **assessments of the need for supported and specialised accommodation**, existing accommodation options available within boroughs should be audited identifying any shortages in capacity or potential extra capacity within schemes, as well as accommodation in need of refurbishment. Boroughs should then use this information to plan to meet identified need, working with relevant authorities, such as children's and adult services, the NHS

and relevant charities. For some groups, need may be best assessed and met on a multi-borough or pan-London basis.

4.12.2 Supported and specialised accommodation can include accommodation that incorporates support for a particular group, sometimes until they are ready to move on. This could potentially be in a hostel setting and is likely to include some communal facilities, but it does not include visitor accommodation.

Policy H13 Specialist older persons housing

A Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of:

1) local housing needs information including data on the local type and tenure of demand, and the indicative benchmarks set out in Table 4.3
2) the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport
3) the increasing need for accommodation suitable for people with dementia.

B Specialist older persons housing provision should deliver:

1) affordable housing in accordance with Policy H4 Delivering affordable housing, and Policy H5 Threshold approach to applications
2) accessible housing in accordance with Policy D7 Accessible housing
3) the highest standards of accessible and inclusive design in accordance with Policy D5 Inclusive design
4) suitable levels of safe storage and charging facilities for residents' mobility scooters
5) pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances.

4.13.1 While London is a 'young city', it is expected to experience substantial growth in its older population. By 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent. Appropriate accommodation is needed to **meet the needs of older Londoners**.

4.13.2 Some older Londoners may wish to **downsize**, move closer to family or friends or be closer to services and facilities, but they may not want to move into specialist older persons housing. Boroughs and applicants should recognise the important role that new, non-specialist residential developments play in providing suitable and attractive accommodation options for older Londoners, particularly developments in or close to town centres, near to relevant facilities and in areas well-served by public transport.

4.13.3 In some circumstances, older people may choose to seek alternative, more tailored **specialist accommodation**. There is a range of specialist accommodation options providing a different offer and level of care.

4.13.4 This policy contains requirements for 'specialist older person housing'. It does not apply to accommodation that has the following attributes, which is considered '**care home accommodation**':

- personal care and accommodation are provided together as a package with no clear separation between the two
- the person using the service cannot choose to receive personal care from another provider
- people using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold
- likely CQC-regulated activity[72] will be 'accommodation for persons who require nursing or personal care'

72 Housing with care: Guidance on regulated activities for providers of supported living and extra care housing, Care Quality Commission, 2015 https://www.cqc.org.uk/files/housing-care-october-2015

4.13.5 Specialist older persons housing that does not provide an element of care but is specifically designed and managed for older people (minimum age of 55 years) is covered by the requirements of this policy.

4.13.6 In addition to this, the requirements of this policy also cover specialist older persons housing that has the following attributes:

i. where care is provided or available;
   a. there are separate contracts/agreements in place for the personal care and accommodation elements, and/or
   b. residents have a choice as to who provides their personal care
ii. housing is occupied under a long lease or freehold, or a tenancy agreement, licensing agreement, license to occupy premises or a leasehold agreement
iii. housing provided is specifically designed and managed for older people (minimum age of 55 years)
iv. likely CQC-regulated activity[73] will be 'personal care'

4.13.7 Where a development does not meet the attributes of 'specialist older persons housing' as defined by paragraph 4.13.6 or the attributes of 'care home accommodation' as defined by paragraph 4.13.4, then the general housing policies in the Plan apply.

4.13.8 Research[74] has identified a **total potential demand** in London across all tenures for just over 4,000 specialist older persons units a year between 2017 and 2029. Table 4.3 provides annual borough benchmarks for specialist older persons housing 2017-2029.

4.13.9 These benchmarks are designed to inform **local level assessments** of specialist housing need. Boroughs should plan proactively to meet identified need for older persons accommodation.

4.13.10 Looking beyond 2029 to 2041, the number of older persons households will continue to increase, although at a slightly slower rate than from 2017 to 2029.

4.13.11 The fast track route for affordable housing delivery is available for specialist older persons housing providers. Where an application does not meet the requirements set out in Part C of Policy H5 Threshold approach to applications

73 Housing with care: Guidance on regulated activities for providers of supported living and extra care housing, Care Quality Commission, 2015 https://www.cqc.org.uk/files/housing-care-october-2015

74 London Plan research reports can be found at https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports

it must follow the Viability Tested Route. However, the **tenure split** requirements for specialist older persons housing may differ to those set out in Policy H6 Affordable housing tenure. Where they do, they should be clearly set out in local Development Plan Documents or supplementary guidance.

4.13.12 Specialist older persons housing developments should also provide a suitable level of **safe storage and charging facilities** for residents' mobility scooters, to prevent the storage of these in communal corridors or spaces which are not designed or suitable for this purpose.

4.13.13 **Dementia** does not just affect older people; however the total number of older people with dementia in London is forecast to rise from 73,825 in 2017 to 96,939 in 2029, an increase of 31 per cent. Methods of offering support for people with dementia have improved in recent years, as have accommodation options. There is currently no clear evidence identifying the best method of provision of dementia care or accommodation, and it is likely that a range of solutions will continue to develop. Boroughs should consider the need for accommodation for people with dementia within specialist older persons housing developments.

4.13.14 **Care home accommodation** (C2) is an important element of the suite of accommodation options for older Londoners and this should be recognised by boroughs and applicants. To meet the predicted increase in demand for care home beds to 2029, London needs to provide an average of 867 care home beds a year. The provision of Care Quality Commission rated Good or Outstanding care home beds is growing at around 3,525 bed-spaces a year in London and provision of dementia-capable bed spaces at a rate of 2,430 places a year. If the rates of supply and demand remain constant it should be possible to meet potential demand for both care home beds and dementia care home beds.

Table 4.3 - Annual borough benchmarks for specialist older persons housing 2017-2029

London Borough	Annual Benchmarks (units per annum
Barking & Dagenham	70
Barnet	275
Bexley	145
Brent	230
Bromley	210
Camden	105
City of London	10
Croydon	225
Ealing	200
Enfield	195
Greenwich	105
Hackney	40
Hammersmith & Fulham	70
Haringey	110
Harrow	165
Havering	185
Hillingdon	180
Hounslow	135
Islington	60
Kensington & Chelsea	85
Kingston	105
Lambeth	70
Lewisham	100
Merton	105
Newham	85
Redbridge	155
Richmond	155
Southwark	65
Sutton	100
Tower Hamlets	45
Waltham Forest	110
Wandsworth	120
Westminster	100
Total	4,115

Policy H14 Gypsy and traveller accommodation

A Boroughs should plan to meet the identified need for permanent gypsy and traveller pitches and must include ten-year pitch targets in their Development Plan Documents.

B Boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for gypsy and traveller accommodation provided in Table 4.4 as identified need for pitches until a needs assessment is undertaken as part of their Development Plan review process.

C Boroughs that have undertaken a needs assessment since 2008 should update this as part of their Development Plan review process.

D Boroughs should undertake an audit of existing local authority provided gypsy and traveller sites and pitches, working with residents occupying these, identifying:

1) areas of overcrowding
2) areas of potential extra capacity within existing sites
3) pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space and landscaping).

E Boroughs should plan to address issues identified in the audits.

F Boroughs should actively plan to protect existing gypsy and traveller and Travelling Showpeople or circus people pitch or plot capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.

4.14.1 Boroughs should **actively plan for gypsy and travellers' accommodation needs**, and should ensure that new sites are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.

4.14.2 The Mayor will initiate and lead a **London-wide** gypsy and traveller **accommodation needs assessment**, and will work to support boroughs in finding ways to make provision for gypsy and traveller accommodation. Until the findings of this new London-wide needs assessment are available for use in Development Plans boroughs should continue to plan to meet the need for permanent gypsy and traveller pitches in accordance with the requirements of Policy H14 Gypsy and traveller accommodation, with a particular focus on Part B.

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4.14.3 Insufficient pitch provision can lead to a rise in **unauthorised encampments**, with implications for the health and wellbeing of gypsy and travellers, community cohesion and costs for boroughs.

4.14.4 It is acknowledged that, in addition to permanent sites, suitable **short-term sites** are an important component of the suite of accommodation for gypsy and travellers. Research is currently underway to understand how a 'negotiated stopping' approach could work in London as a way of minimising the number of unauthorised encampments.

4.14.5 To assist boroughs in meeting identified need, **Mayoral funding** will be available through the Homes for Londoners Affordable Homes Programme for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches identified via an audit of existing pitches.

4.14.6 Where **new gypsy and traveller pitches** are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.

4.14.7 If existing gypsy and traveller pitches or Travelling Showpeople's or circus people's sites or plots have to be **re-located or re-provided** within a borough, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible. Residents occupying pitches, sites or plots should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved, and replacement accommodation should be secured before relocation takes place.

4.14.8 The requirements of H14 are in addition to the duties under **section 124 of the Housing and Planning Act 2016**, which require local housing authorities to consider the needs of people residing in or resorting to their district with respect to the provision of both sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.

Table 4.4 - Need for gypsy and traveller pitches from London Boroughs' Gypsy and Traveller Accommodation Needs Assessment March 2008,[75] midpoint need figure 2007-2017

Borough	Need
Barking and Dagenham	8
Barnet	8
Bexley*	N/A
Brent	18
Bromley	74
Camden	4
City of London	0
Croydon	15
Ealing	38
Enfield	1
Greenwich	34
Hackney	24
Hammersmith and Fulham	3
Haringey	32
Harrow	8
Havering	20
Hillingdon	25
Hounslow	11
Islington	2
Kensington and Chelsea	9
Kingston upon Thames	10
Lambeth	7
Lewisham	12
Merton	10
Newham	15
Redbridge	11
Richmond upon Thames	9
Southwark	15
Sutton	11
Tower Hamlets	33
Waltham Forest	5
Wandsworth	7
Westminster	0

* London Borough of Bexley was excluded from the commissioning of this research and no survey work took place there.

75 London Boroughs' Gypsy and Traveller Accommodation Needs Assessment, Forham Research, 2008: https://www.london.gov.uk/sites/default/files/london_boroughs_gypsy_and_traveller_accommodation_needs_assessment_-_final_report_-_2008_-_fordham_research.pdf

Policy H15 Purpose-built student accommodation

A Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that:

1) at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood
2) the use of the accommodation is secured for students[76]
3) the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider[77]
4) the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance:
    a) to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution

76 For the implementation of this policy a student is a person following a course in higher education as recognised by the Office for Students.

77 A higher education provider is defined as an education institution that provides a designated course that has been approved by the Department for Education for higher education study which allows the student to apply for government-financed student loans. Higher education study is at qualification Level 4 or above (i.e. above A-level or equivalent). Further information on qualification levels can be found here: https://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels. The Office for Students provides a register listing all the English higher education providers that it officially recognises, which can be found at https://www.officeforstudents.org.uk/advice-and-guidance/the-register/the-ofs-register/. This register can be used to determine if a higher education provider delivers designated courses and thus satisfies the above definition. Further advice on higher education providers and designated courses can be obtained by contacting London Higher at enquiry@londonhigher.ac.uk

b) where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in Policy H5 Threshold approach to applications, Part E

c) the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.

5) the accommodation provides adequate functional living space and layout.

B Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

4.15.1 London's higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. The housing need of students in London, whether in **Purpose-Built Student Accommodation** (PBSA) or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London SHMA. London's overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units. However, new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need.

4.15.2 The **overall strategic requirement for PBSA** in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been identified.[78] Meeting the requirement for PBSA should not undermine policy to secure mixed and inclusive neighbourhoods.

4.15.3 The strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the Plan period with changes in higher education providers' estate and expansion plans, availability of appropriate

78 Student population projections and accommodation need for new London Plan 2017 (amended October 2018) GLA

sites, and changes in Government policy that affect their growth and funding. To demonstrate that there is a need for a new PBSA development and ensure the accommodation will be supporting London's higher education providers, the student accommodation must either be operated directly by a higher education provider or the development must have an agreement in place from initial occupation with one or more higher education providers, to provide housing for its students, and to commit to having such an agreement for as long as the development is used for student accommodation. This agreement is known as a **nomination agreement**. A majority of the bedrooms in the development must be covered by these agreements. Therefore, the borough should ensure, through condition or legal agreement, that the development will, from the point of occupation, maintain a nomination agreement or enter a new nomination agreement with one or more higher education provider(s) for a majority of the bedrooms in the development, for as long as it is used as student accommodation. There is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed.

4.15.4 Where all the bedrooms in the PBSA development are provided at a rental cost that qualifies as affordable student accommodation as defined in paragraph 4.15.8 and maintained in perpetuity through legal agreement or condition, there is no requirement for it to have a nomination agreement with a higher education provider.

4.15.5 If the accommodation is not secured for use by students and secured through a nomination agreement for occupation by students of one or more higher educational providers as set out in paragraph 4.15.3 or is exempt from this requirement as set out in paragraph 4.15.4, it will not be considered as purpose-built student accommodation or meeting a need for purpose-built student accommodation; and the development proposal will normally be considered large-scale **purpose-built shared living** and be assessed by the requirements of Policy H16 Large-scale purpose-built shared living.

4.15.6 PBSA should provide adequate functional living space and layout for the occupants. The **design** of the development must be high quality and in accordance with the requirements of Policy D3 Optimising site capacity through the design-led approach.

4.15.7 To ensure students with an income equivalent to that provided to full-time UK students by state-funded sources of financial support for living costs can afford to stay in PBSA, the maximum number of bedrooms in PBSA are required to be affordable at this income level. The rental cost for this affordable student accommodation has been defined through the work of the

Mayor's Academic Forum.[79] In addition, the Mayor seeks the development of student accommodation which is affordable for the student body as a whole. Providers of PBSA are encouraged to develop models for delivery of PBSA in London which **minimise rental costs** for the majority of the bedrooms in the development and bring these rates nearer to the rate of affordable student accommodation.

4.15.8 The **definition of affordable student accommodation** is a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year. The actual amount the Mayor defines as affordable student accommodation for the coming academic year is published in the Mayor's Annual Monitoring Report. Should the Government make significant changes to the operation of the maintenance loan for living costs as the main source of income available from the Government for higher education students, the Mayor will review the definition of affordable student accommodation and may provide updated guidance.

4.15.9 To provide greater certainty, speed up the planning process and increase the delivery of affordable student accommodation, a threshold has been introduced for PBSA schemes to take advantage of the Fast Track Route. To follow the **Fast Track Route** the amount of affordable student accommodation provided should be at least 35 per cent of student bedrooms in the development, or 50 per cent where required by Part B of Policy H5 Threshold approach to applications. If the required threshold for affordable student accommodation is not met, a scheme will be considered under the **Viability Tested Route** in line with Part E of Policy H5 Threshold approach to applications and the Mayor's Affordable Housing and Viability SPG.

4.15.10 The affordable student accommodation should be equivalent to the non-affordable rooms in the development in terms of room sizes and room occupancy level. The **rent** charged must include all services and utilities which are offered as part of the package for an equivalent non-affordable room in the development. There should be no additional charges specific to the affordable accommodation.

4.15.11 The **initial annual rental cost** for the element of affordable accommodation should not exceed the level set out in the Mayor's Annual Monitoring Report for

79 The Mayor's Academic Forum is composed of representatives from the boroughs, universities, private and voluntary sector accommodation providers and students, and is chaired and serviced by the GLA.

the relevant year. For following years, the rental cost for this accommodation can be linked to changes in a nationally-recognised index of inflation such as the Consumer Prices Index or CPIH.[80] A review period, such as every three years, could be set by the borough to allow for recalibrating the affordable student accommodation to the level stated as affordable in the Mayor's Annual Monitoring Report.

4.15.12 Where the development is not operated directly by a higher education provider, the affordable student accommodation bedrooms should be part of the PBSA that is subject to a nomination agreement. **Allocation** of affordable student accommodation should be by the higher education provider(s) which operates it or has the nomination right to it, and the provider(s) should allocate the rooms to students it considers most in need of the accommodation.

4.15.13 To enable providers of PBSA to maximise the delivery of affordable student accommodation by increasing the profitability of the development, boroughs should consider allowing the **temporary use of accommodation** during vacation periods for ancillary uses. Examples of such uses, amongst others, include providing accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses at any institution approved in advance by the borough. The temporary use should not disrupt the accommodation of the resident students during their academic year. Conditions and/or legal agreements could be attached to any planning permission to ensure that the ancillary use does not result in a material change of use of the building.

4.15.14 Where a PBSA development meets all the requirements of Part A, boroughs should not require on-site provision of, or a contribution towards, conventional Use Class C3 affordable housing.

4.15.15 In **monitoring** the implementation of this policy, particular regard will be given to the delivery of PBSA, the amount of affordable student accommodation provided, and the rental costs of the non-affordable rooms in PBSA developments.

80 CPIH is a new additional measure of consumer price inflation including a measure of owner occupiers' housing costs, please see this webpage for further information: https://www.ons.gov.uk/economy/inflationandpriceindices/qmis/consumerpriceinflationqmi.

Policy H16 Large-scale purpose-built shared living

A Large-scale purpose-built shared living development[81] must meet the following criteria:

1) it is of good quality and design
2) it contributes towards mixed and inclusive neighbourhoods
3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency
4) it is under single management
5) its units are all for rent with minimum tenancy lengths of no less than three months
6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
    a) convenient access to a communal kitchen
    b) outside communal amenity space (roof terrace and/or garden)
    c) internal communal amenity space (dining rooms, lounges)
    d) laundry and drying facilities
    e) a concierge
    f) bedding and linen changing and/or room cleaning services.
7) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes
8) a management plan is provided with the application
9) it delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an:
    a) upfront cash in lieu payment to the local authority, or
    b) in perpetuity annual payment to the local authority

81 Large-scale purpose-built shared living developments are sui generis

10) In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution, to be provided at a discount of 50 per cent of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy H5 Threshold approach to applications, however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review.

4.16.1 **Large-scale shared living developments** may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. This policy is required to ensure that new purpose-built shared living developments are of acceptable quality, well-managed and integrated into their surroundings.

4.16.2 This policy applies to large-scale purpose-built shared living developments which in planning terms are **sui generis non-self-contained market housing**. These are not restricted to particular groups by occupation or specific need such as students, nurses or people requiring temporary or emergency accommodation proposed by speciality providers.

4.16.3 Large-scale purpose-built shared living developments are generally of at least 50 units. This type of accommodation is seen as providing an alternative to traditional flat shares and includes additional services and facilities, such as room cleaning, bed linen, on-site gym and concierge service. **Tenancies** should be for a minimum of three months to ensure large-scale purpose-built shared living developments do not effectively operate as a hostel.

4.16.4 A **management plan** must be produced and submitted with the planning application showing how the whole development will be managed and maintained to ensure the continued quality of the accommodation, communal facilities and services, and that it will positively integrate into the surrounding communities. The agreed management plan should be secured through a Section 106 agreement and should include, but not be limited to, detailed information on:

a. security and fire safety procedures

b. move in and move out arrangements

c. how all internal and external areas of the development will be maintained

d. how communal spaces and private units will be cleaned and how linen changing services will operate

e. how deliveries for servicing the development and residents' deliveries will be managed.

4.16.5 It is important within a large-scale purpose-built shared living development to **create a sense of community**. Buildings should be designed and managed in a way that lowers barriers to social interaction and encourages engagement between people:

- incidental meeting spaces should be provided in public and semi-public spaces within the building
- communal kitchen spaces should be designed for social interaction, such as shared kitchens with cooking stations facing each other
- amenity spaces should be of a size and quality that actively encourages their use and community engagement
- where appropriate, entrance lobbies and public amenities such as restaurants and bars should encourage use by the surrounding local community as well as the internal community.

4.16.6 The private units should be appropriately sized to be comfortable and functional for a tenant's needs and may include facilities such as en-suite bathrooms and limited cooking facilities. There are currently no minimum space standards for communal and private areas of this type of accommodation. Given the generally small size of the private space in these developments, the **communal amenity spaces** are important elements in ensuring that the quality of the overall residential amenity is acceptable. If deemed necessary, the Mayor will produce planning guidance, including space standards, for this form of accommodation.

4.16.7 This form of accommodation is required to **contribute to affordable housing**. However, because it does not meet minimum housing space standards it is not considered suitable as a form of affordable housing itself. Therefore, a financial contribution is required for affordable housing provided through the borough's affordable housing programme.

4.16.8 A borough can decide whether it would prefer the **financial contribution** as a single upfront payment for affordable housing (Part A9a of Policy H16 Large-scale purpose-built shared living), which will be based on a 50 per cent discount to market value of 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and

substitution, or an ongoing in perpetuity payment linked to actual rental income (Part A9b of Policy H16 Large-scale purpose-built shared living). The ongoing payment should be based on 50 per cent of rental income for 35 per cent of units for as long as the development is used for this form of accommodation. Because of the immaturity of the market for this type of development, all large-scale purpose-built shared living developments will be assessed under the Viability Tested Route as set out in Policy H5 Threshold approach to applications. However, schemes which meet the relevant threshold will not be subject to a Late Stage Viability Review.

4.16.9 The **rental cost** of this form of accommodation is not directly comparable to the rental costs of conventional Use Class C3 housing**,** as shared living units are significantly smaller than the minimum housing space standard i.e. a one person dwelling of 37 sq.m.. Shared living tenants typically pay a room rate that includes utility costs and rent. If a comparison is undertaken it should be on a square metre rental rate, excluding utility costs, of the private accommodation and not a unit rental rate.

Chapter 5

Social Infrastructure

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Policy S1 Developing London's social infrastructure

A When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.

B In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans.

C Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.

D Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.

E New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.

F Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should only be permitted where:

1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or;
2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.

G Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan (see Part F2).

5.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes **health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities**. There are a wide variety of providers delivering these services, from large state-funded organisations, public and private institutions and specialist providers, to charitable trusts, the voluntary sector, community and faith groups, and individuals. Alongside more formal provision of services, there are informal networks and community support that play an important role in the lives of Londoners. This chapter primarily addresses the delivery of social infrastructure facilities. Many service providers may operate from or require other types of space, for example cultural facilities (addressed in Chapter 7) or offices (addressed in Policy E1 Offices). Green infrastructure in all its forms is also a key component of social infrastructure, and is addressed separately in Chapter 8, Policy G3 Metropolitan Open Land and Policy G4 Open space.

5.1.2 Social infrastructure plays an important role in developing **strong and inclusive communities**. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place.

5.1.3 **Planning for social infrastructure** in London is complex. There are a wide range of providers and stakeholders and the degree of clarity around future provision and funding varies. It is therefore important that boroughs work collaboratively with service providers and other stakeholders, including the local community, to fully understand existing and future social infrastructure needs and plan appropriately for these, including through their infrastructure delivery plan and the Community Infrastructure Levy. This will also help facilitate an integrated approach to service delivery.

5.1.4 **Needs assessments** should be informed by both an understanding of the demographic make-up and socio-economic data required by Policy D1 London's form, character and capacity for growth as well as an audit of existing facilities and services. Supplementary Planning Guidance will be developed to inform this.

5.1.5 The **loss of social infrastructure** can have a detrimental effect on a community. Where possible, boroughs should protect such facilities and uses, and where a development proposal leads to the loss of a facility, require a replacement that continues to meet the needs of the neighbourhood it serves. A realistic proposal for replacement social infrastructure should be able to demonstrate funding, appropriate site availability and timely delivery of adequate facilities. To further protect against the loss of social infrastructure that is valued by a local community or group, boroughs should consider approving the designation

of a facility as an Asset of Community Value (ACV) if put forward by the local community.

5.1.6 In cases where social infrastructure premises may be deemed redundant and a replacement facility is no longer necessary or appropriate, **other forms of social infrastructure should be considered** for the site or part of the site to help meet other community needs, before alternative uses are pursued.

5.1.7 It is recognised that there will be cases where social infrastructure providers are undertaking an agreed programme of social infrastructure re-provision or **service reconfiguration**, such as has been seen within healthcare. Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with Parts D and F of Policy S1 Developing London's social infrastructure and Policy Policy S2 Health and social care facilities and any related information or guidance to achieve the overall aims of the programme and to continue to meet the needs of Londoners.

5.1.8 In all cases, where housing is considered an appropriate alternative use, opportunities for **affordable housing provision** should be maximised.

5.1.9 Social infrastructure should be **easily accessible** by walking, cycling and public transport in accordance with the Healthy Streets Approach.

5.1.10 It is important to consider the way that social infrastructure integrates with other facilities and the way people who live or work in the area want to access it. **Shared use and co-location of facilities** should be encouraged, to align service provision, use land more efficiently and facilitate opportunities for different groups of people to come together, encouraging further inclusion and community participation. Shared use and co-location will help facilities and service providers work in a more coherent and joined-up way, and share maintenance and management costs. It could reduce the need to travel thereby improving accessibility. Examples of this include schools opening their facilities out of hours for use by the community, the co-location of health and sports facilities, or the co-location of facilities with housing to ensure effective usage.

5.1.11 Voluntary and community groups often find it difficult to find premises suitable for their needs. **Unused or underused facilities should be brought into use**, where possible, to help address these needs. The additional use or reuse of places of worship should be considered for providing accommodation for other traditions or faiths and/or wider community functions.

Policy S2 Health and social care facilities

A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:

1) identify and address local health and social care needs within Development Plans, taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies
2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision to maximise health and care outcomes
3) undertake a needs assessment to inform Development Plans, including an audit of existing health and social care facilities. Needs should be assessed locally and sub-regionally, addressing borough and CCG cross-boundary issues
4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision and to address needs across borough boundaries
5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.

B Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported.

C New facilities should be easily accessible by public transport, cycling and walking.

5.2.1 London's health care services are vital to maintaining and improving Londoners' quality of life. The health service is also one of the capital's major employers, with over 200,000[82] people working in the NHS in London. Several factors

82 NHS Workforce Statistics, NHS, April 2018 https://digital.nhs.uk/data-and-information/publications/statistical/nhs-workforce-statistics/nhs-workforce-statistics---april-2018

affect the **demand for health services and facilities**. These include a growing and ageing population, an increase in complex and long-term health conditions that need an integrated approach, and changes in patients' personal preferences. New treatments and technologies are also transforming the ability to predict, diagnose and treat conditions. Policies throughout the Plan seek to support preventative health measures and contribute positively to the wider determinants of health. This policy facilitates this by supporting the integrated service delivery of health and social care facilities and services.

5.2.2 The NHS Long Term Plan[83] builds on the NHS Five Year Forward View, which identified the need to **prevent avoidable illness** and **transform the way that care is organised and delivered** to meet increasing demands for healthcare within the resources available. It describes the following priorities:

- increasing support for people to manage their own health better, for example through diabetes prevention and management and online therapies for common mental health problems
- undertaking a higher proportion of healthcare in community rather than hospital settings
- redesigning and reducing pressure on emergency hospital services establishing digitally-enabled primary and outpatient care across the NHS
- making best use of available assets, including more flexible approaches to how facilities are used and the overall configuration of the health estate, which requires a mix of dis-investment in older, out-of-date facilities and re-investment in more modern, fit for purpose estate
- ensuring that models of care change and continuously evolve
- ensuring that existing and planned new health infrastructure supports and facilitates change.

5.2.3 There are currently four broad **types of health infrastructure provision**:

- primary care – GP practices, plus community pharmacists, dentists and opticians
- community healthcare – this covers a wide range of diagnostic and healthcare services, including non-acute mental health services, which provide a means of delivering care closer to home than from a hospital setting
- acute provision
- specialist provision.

83 The NHS Long Term Plan (NHS England, January 2019)

5.2.4 **Sustainability and Transformation Plans** (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area. Local NHS organisations will increasingly focus on population health and partnerships with local authority-funded services through the development of new integrated care systems (ICSs) that will emerge from sustainability and transformation partnerships. ICSs will deliver the integration of primary and specialist care, physical and mental health services and health and social care.

5.2.5 Whilst there is no one-size-fits-all model of care, and an increasing blurring of the boundaries between primary, secondary (acute) and tertiary (specialist) health services, there are some broad underlying **principles that underpin the planning of new facilities** or changes to existing facilities. The NHS General Practice Forward View[84] and the NHS Long Term Plan support the provision of primary care at greater scale, with larger practices and/or more joined up networks of GPs offering a wider range of services to patients, including extended opening hours and widespread use of digital consultations. This means fewer GP practices serving larger patient catchments (perhaps 10-20,000 people per practice) and operating from larger premises than is the norm at present. Models of community healthcare are based around larger population catchments (50,000 or more people) or localities to ensure individual services are viable, and to maximise the benefits of integrating and/or co-locating services in community healthcare centres or hubs, or in more flexible ways across localities or networks of service providers.[85]

5.2.6 In **assessing the need for new health and social care facilities**, consideration should be given to the location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all growth. Joint Strategic Needs Assessments produced by local Health and Wellbeing Boards describe the current and future health and wellbeing needs of the local population and identify priorities for action which are set out in more detail in the Boards' Health and Wellbeing Strategies. These documents are valuable sources of evidence to inform the development and review of Development Plans.

84 General Practice Forward View, NHS England, 2016, https://www.england.nhs.uk/wp-content/uploads/2016/04/gpfv.pdf

85 Breaking down barriers to better health and care, NHS England, June 2018

5.2.7 Where population growth and change is taking place at modest levels, it may be possible to accommodate this through a combination of **efficiency savings, service reconfiguration and small adjustments in capacity**, for example through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that **new primary and community facilities or capacity will need to be provided**. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions.

5.2.8 The **co-location of facilities with other uses**, such as other forms of social infrastructure or housing, is encouraged to use land more efficiently and to enable a more integrated service delivery.

5.2.9 Development and regeneration proposals for an area provide an opportunity to **re-think how land and buildings are used** and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies).

Policy S3 Education and childcare facilities

A To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:

1) prepare Development Plans that are informed by a needs assessment of education and childcare facility needs. Needs should be assessed locally and sub-regionally, addressing cross-boundary issues. Needs assessments should include an audit of existing facilities.

2) identify sites for future provision through the Development Plan process, particularly in areas with significant planned growth or need for school places (including Special Educational Needs and Disability places)

3) ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.

B Development proposals for education and childcare facilities should:

1) locate facilities in areas of identified need

2) locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling

3) locate entrances and playgrounds away from busy roads, with traffic calming at entrances

4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively to school (walk, cycle or travel by public transport)

5) maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures

6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers

7) ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach

8) ensure that facilities incorporate suitable, accessible outdoor space

9) locate facilities next to parks or green spaces, where possible

C Development proposals should ensure that there is no net loss of education or childcare facilities, unless it can be demonstrated that there is no ongoing or future need. Any proposed loss of sport or recreation land (including playing fields) should be considered against the requirements of Part C of Policy S5 Sports and recreation facilities.

5.3.1 **Access to high quality education and training** has a profound effect on people's life chances and is one of the most powerful ways to break down inequalities and improve social mobility. Every child, young person and adult should be given the best possible chance for success and be equipped to make the most of the economic opportunities the capital has to offer. High quality education and training provision, including the allocation of sufficient sites and the development of childcare facilities, schools, colleges and universities in appropriate places, will not only help to provide greater educational choice but will also improve skills, which is critical in tackling disadvantage. Good quality education and training are vital for supporting people into sustainable employment, which is also essential to London's continued economic success.

5.3.2 **Access to affordable, accessible and high-quality childcare** (pre-school and school age) provision can play a significant role in children's development and positively influence school-readiness, future educational attainment, economic participation and health. Universal, high-quality, early childhood education and care not only benefits the whole population but can particularly benefit children from the most disadvantaged backgrounds. As well as the positive benefit for children, it also helps to enable parents to go back to work.

5.3.3 It is estimated that an additional 100,000 **childcare places** will be needed between 2016-2041.[86] The Childcare Act 2006 places a duty on local authorities to ensure that there are enough childcare places to enable parents to work or train, and also to ensure that there are sufficient funded early education places for all three and four year-olds within the local authority area. In consultation with parents, the private, voluntary and independent sectors, and other key partners, boroughs should ensure the location and provision of a range of childcare services in different types of settings to meet the needs of local communities.

5.3.4 **Childcare facilities** should be safe, accessible for all, and provide both indoor and outdoor learning opportunities and should be provided within new housing and/or commercial developments where there is a need. Nurseries should be incorporated into new primary schools where appropriate.

5.3.5 There is a **growing need for school places** in London, with projected need for 705,000 mainstream state-funded primary school places required for the academic year 2018/19. This is an increase of 7,000 over the number of places required in 2016/17. The level of need is projected to fall to 686,000 places a year by 2027/28. In 2016/17, there was a need for 403,000 places in mainstream state-funded secondary schools. The number of places required is projected

86 Demand for childcare in London – drivers and Projections, GLA, March 2018

to increase by 65,000, over the period to 2027/28.[87] This need, particularly for secondary school places, requires a strategic approach to delivery, making it harder to quantify within individual boroughs. Boroughs are encouraged to work together to meet the needs for secondary school places. Where possible, sites for schools should be allocated within Development Plans.

5.3.6 There is a need for an increase in **Special Educational Needs and Disability** (SEND) **provision** in London and it is important that these places are planned for. Some of this provision will be within mainstream schools and some within specialist schools. It is important that all schools are designed to be accessible and inclusive, meeting the highest standards of accessible and inclusive design (see Policy D5 Inclusive design and Area guidelines for SEND and alternative provision: BB104).[88]

5.3.7 The **London Schools Atlas**[89] is an interactive map and dataset enabling users to view both existing patterns of schooling across the capital, and projections of future changes in the school age population. The Atlas is intended to be a resource for both parents and school place planners that supports collaborative working between providers in London.

5.3.8 **Higher education** in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced research, and infrastructure to support business growth, such as incubation space and business support services. It is also a significant employer and attracts major international companies able to benefit from universities' research reputations, such as in pharmaceuticals and life sciences. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. The Mayor has established a forum for higher education institutions and further education establishments to work with boroughs and other stakeholders to plan future developments, including student accommodation, in locations which are well-connected to public transport.

5.3.9 Access to **further education** (FE) plays a key role in skills development and life-long learning and assists with Londoners' progression into, and through, sustainable employment, including apprenticeships. There is a predicted increase in demand for FE provision, due to the growing number of 16-19 year-

87 2018 GLA School Place Demand Projections, GLA Intelligence Unit, 2018

88 Department for Education and Education Funding Agency SEND and alternative provision: area guidelines, https://www.gov.uk/government/publications/send-and-alternative-provision-area-guidelines

89 https://maps.london.gov.uk/schools/

olds, and the new requirement for all young people to remain in learning until they are 18. Meeting this growing demand will require strategic planning and working across boroughs. FE institutions also provide valuable community facilities and services. The Mayor will continue to support the enhancement of FE colleges and other training facilities through the Skills for Londoners Capital Fund.

5.3.10 The **design of education and childcare facilities** is critical to the creation of a good learning environment. Education and childcare facilities should be in locations that are easily accessible on foot, by cycling or using public transport. The design of entrances to schools and playgrounds is important in ensuring that children are encouraged to walk and cycle to the school gate and can do so safely. Facilities should be located away from busy roads, with traffic calming at entrances, to benefit from reduced levels of air pollution, noise and road danger. Where possible, natural features such as trees, greenery, forest schools and spaces for food growing should be incorporated into playgrounds and school sites, recognising both the health and educational benefits these can provide. Healthy and safe routes to education and childcare facilities, should be considered through the design process.

5.3.11 The Department for Education gives area guidelines for mainstream schools.[90] Accepting that these guidelines can sometimes be difficult to achieve in London, **innovative design solutions** should be considered in order to meet the needs of the school, including the provision of outdoor space.

5.3.12 School and college facilities – in particular sports, play, training and meeting facilities – should be capable of use by the wider community outside their main operating hours. They can provide venues for a range of community activities, including nurseries, children's centres, cultural, youth and sports activities. Designing schools and colleges with this shared use in mind, and ensuring they are safe for a range of uses, also allows for more adaptability around changing work and lifestyle patterns, and extended childcare and holiday provision. Sharing of facilities such as sports pitches and multi-use games areas and locating schools next to parks and open spaces can also further encourage the **shared use of space**, particularly where space on a school or college site is limited. Education and childcare facilities could also be co-located with other uses such as housing and mixed-use developments at higher densities.

90 Notes on area guidelines for mainstream schools: BB103, Education Funding Agency, 2015, https://www.gov.uk/government/publications/mainstream-schools-area-guidelines/area-planning-for-maintained-schools

Policy S4 Play and informal recreation

A Boroughs should:

1) prepare Development Plans that are informed by a needs assessment of children and young person's play and informal recreation facilities. Assessments should include an audit of existing play and informal recreation opportunities and the quantity, quality and accessibility of provision. Boroughs should consider the need for cross-borough collaboration where appropriate
2) produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs.

B Development proposals for schemes that are likely to be used by children and young people should:

1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile
2) for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that:
    a) provides a stimulating environment
    b) can be accessed safely from the street by children and young people independently
    c) forms an integral part of the surrounding neighbourhood
    d) incorporates trees and/or other forms of greenery
    e) is overlooked to enable passive surveillance
    f) is not segregated by tenure
3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently
4) for large-scale public realm developments, incorporate incidental play space to make the space more playable

5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough's play and informal recreation strategy should be used to identify ongoing or future demand for play provision.

5.4.1 **Safe and stimulating play** is essential for children and young people's mental and physical health. It is not just an activity confined to playgrounds and play areas but is something that can be done in all aspects of a child's life, in a wide variety of locations and environments. Accessing a variety of opportunities for play and being able to be independently mobile within their neighbourhood, is important for children and young people's wellbeing and development. When preparing needs assessments, boroughs should consult with children and young people to ensure their needs are understood in terms of existing and future provision.

5.4.2 Many children and young people, however, find that there are limited opportunities for them to play in their local neighbourhood. This is often not because of a lack of formal play provision, but due to restrictive street design and layouts, poor links between spaces for play and recreation, and the threat of busy roads and traffic. Developments should **encourage children and young people to move around freely** through safe streets and footpath networks that connect to more formal play provision, green spaces and parks, and that follow the Healthy Streets Approach.

5.4.3 It should be recognised that children play in all sorts of spaces, including playgrounds, playing fields, skate parks and other recreation areas and this should generally be encouraged and taken account of in the design and layout of development. Where **formal play provision** is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating, and should balance the need to be safe whilst also providing an element of risk, which is important for children's development. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads. Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security. Integrating natural environments into play provision is encouraged, acknowledging the benefits to learning, and to help to support a green infrastructure network across the city.

5.4.4 There should be **appropriate provision for different age groups**, including older children and teenagers. Particular consideration should be given to

consultation with children and young people in the design of new provision to understand their changing needs. The needs of parents and carers should also be considered in the design of these spaces. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Youth facilities for young people should also be incorporated where possible to ensure that young people have suitable spaces to meet and play and feel welcome and included in developments and the public realm.

5.4.5 Formal play provision should normally be made **on-site** and provide at least 10 square metres per child to address child occupancy and play space requirements generated by a development proposal. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.

5.4.6 **Off-site provision**, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400 metres of the development and be accessible via a safe route from children's homes. Schools, school playing fields and other facilities can also provide an important contribution to play and informal recreation facilities and should be encouraged to allow community access to facilities out of hours.

5.4.7 Through the development of **play strategies**, boroughs should ensure the integration of play provision and child-friendly neighbourhoods into other borough strategies. Boroughs are encouraged to collaborate when developing strategies to ensure play spaces are provided in an integrated way and to help create child-friendly neighbourhoods across borough boundaries.

Policy S5 Sports and recreation facilities

A To ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:

1) prepare Development Plans informed by a needs assessment for sports and recreation facilities. Needs should be assessed at the local and sub-regional level. Needs assessments should include an audit of existing facilities

2) secure sites for a range of sports and recreation facilities in Development Plans, as justified by the needs assessment

3) maintain, promote and enhance networks for walking, cycling and other activities including the Walk London Network shown on Figure 5.1

B Development proposals for sports and recreation facilities should:

1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling

2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities

3) support the provision of sports lighting within reasonable hours, where there is an identified need for sports facilities, and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity.

C Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:

1) an assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing or alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; or

2) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

3) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

D Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (Policy G2 London's Green Belt, Policy G3 Metropolitan Open Land and Policy G4 Open space) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.

5.5.1 Sport and recreation facilities are important components of social infrastructure. Both **formal and informal facilities** should be provided, to encourage physical activity and deliver a range of social, health and wellbeing benefits to communities. People take part in various forms of sport and recreation which require a number of different types of facility. Many activities require minimal facilities, and often an open space or community hall can be sufficient.

5.5.2 Current provision of swimming pools, artificial grass pitches (AGPs), and sports halls is not meeting demand.[91] The need is most significant for AGPs where only 55 per cent of demand is currently being met. Swimming pools currently meet 93 per cent of total demand across London and sports halls meet 85 per cent of demand. For all types of facilities, the level of **unmet demand is projected to increase** by 2041 if no new facilities are provided. Increasing the catchment areas of existing facilities by improving public transport accessibility and access by walking and cycling, plus extending their opening hours, could increase their availability and potential number of users. Where new facilities are to be provided, they should be located in accessible locations, with the ability to maximise opening hours.

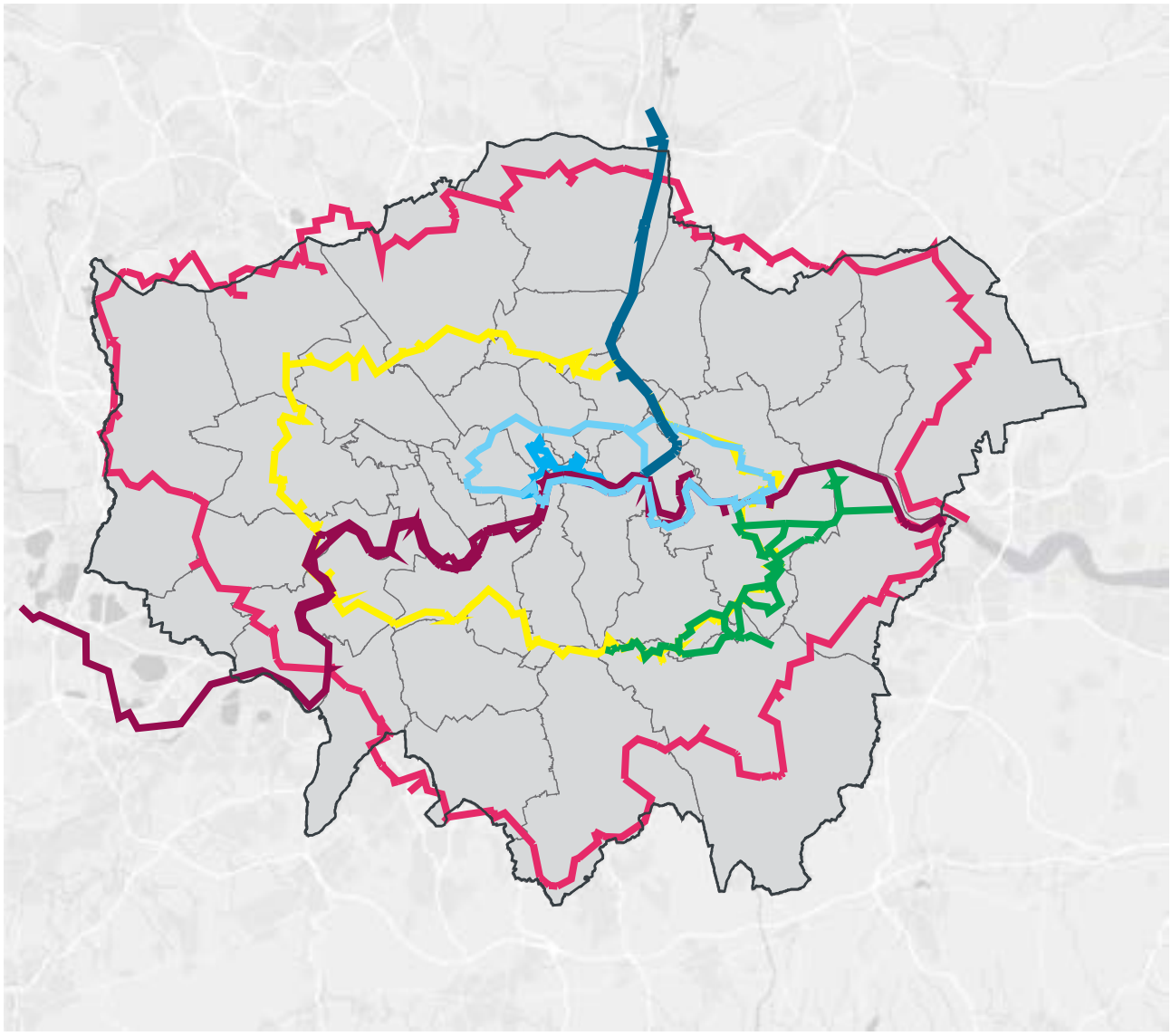
5.5.3 It is essential that boroughs **plan strategically for future provision** of these core sports facilities. Boroughs should assess the need for sport and recreation facilities to ensure appropriate levels of provision and help tackle inequality of access in London, particularly in areas or for groups with low participation. By their nature, sports facilities often form a part of open space, so sports and open space needs assessments should have regard to one another. Built sports facilities should only be accommodated on green open space if that area has been identified as surplus to requirements as per an open space strategy or the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss of green open space.

5.5.4 Up-to-date **playing pitch strategies** can be used to protect and enhance the use of existing playing fields and help to plan for where more are needed. Sport England provides guidance on the preparation of these strategies, which underscores the importance of a strategic approach to provision to take account of demand for facilities crossing borough boundaries, particularly in relation to specialist activities.

5.5.5 **Specialist sporting venues and stadiums** also have a role to play in providing facilities and enabling wider access to sport, as well as having an important cultural value.

91 Strategic Assessment of Need: Swimming Pools, Sports Halls and Artificial Grass Pitch provision in London 2017-2041 Facilities Planning Model, Sport England, July 2017

Figure 5.1 - Walk London Network



Walk London Network

- Lea Valley Walk
- Jubilee Walk
- Jubilee Greenway
- Green Chain
- Capital Ring
- Thames Path
- London Loop

Source: Transport for London (TfL)

Contains OS data © Crown copyright and database right (2017)

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5.5.6 The **co-location** of sports facilities should be encouraged, particularly within new and existing schools, colleges, commercial schemes and community centres. This will help ensure the right mix of facilities in the right places to meet sporting demand and to increase participation.

5.5.7 **Lighting** can be important for the accessibility of outdoor sports facilities and can help to improve their use. The form of lighting required will depend on the facility and its use, but efforts should be made to minimise the impact on the surrounding areas, and not to cause a demonstrable harm to the local community or biodiversity. The hours of use of lighting should be agreed early in the process.

5.5.8 Places that are designed for people to be active and to move around freely will also encourage more physical activity in people's daily lives. Existing networks, such as the **Walk London Network**, also help to encourage this further.

Policy S6 Public toilets

A Large-scale developments[92] that are open to the public, and large areas of public realm, should provide and secure the future management of:

1) free publicly-accessible toilets suitable for a range of users including disabled people, families with young children and people of all gender identities; and
2) free 'Changing Places' toilets designed in accordance with the guidance in British Standard BS8300-2:2018.

These should be available during opening hours, or 24 hours a day where accessed from areas of public realm.

92 'Large-scale' should be taken to mean developments that fall within Category 1B, Part 1 of The Town and Country Planning (Mayor of London) Order 2008, unless a development plan provides a local definition.

5.6.1 **Public toilets are a vital facility**, both for Londoners and visitors to the city. They are especially important for certain groups including disabled people, older people, people with babies and young children and pregnant women, as well as tourists and visitors who may be less familiar with their surroundings. Public toilets can support businesses in boosting customer footfall, by giving people

more confidence to move around the city and spend more time in a place or space, as well as helping to keep London clean.

5.6.2 Public toilets should be provided as part of large-scale developments that are open to the public, such as shops, sport, leisure and health care facilities, transport hubs, cultural and civic buildings and large areas of public realm. Boroughs should define 'large-scale' for their local circumstances. Where no local definition is given, 'large-scale' should be taken to mean developments that come under Category 1B, Part 1 of The Town and Country Planning (Mayor of London) Order 2008.

5.6.3 In **smaller developments**, and subject to local evidence and Development Plan policy, boroughs may secure access to toilet facilities as part of a community toilet scheme, or secure provision of public toilets through CIL or planning obligations.

5.6.4 Taking into account the needs of all Londoners, and to provide suitable levels of choice, **a range of toilet facilities** should be provided. They should include unisex disabled persons' toilets, separate accessible baby change/family toilets, and cubicles for people with ambulant mobility impairments which can also be suitable for some older people or people who require additional space. Further guidance on the provision and design of these facilities can be found in British Standard BS8300-2:2018 (Design of an accessible and inclusive built environment, Part 2: Buildings – Code of practice). Where gender-specific toilets are provided, a gender-neutral option should also be provided wherever possible (in addition to unisex disabled persons toilets). Consideration should be given to the capacity of facilities in order to minimise queuing, particularly where female gender-specific toilets are provided. Further guidance for determining the number of toilets needed in a location can be found in British Standard BS6465-4:2010 Sanitary installations Part 4: Code of practice for the provision of public toilets.

5.6.5 Public toilets which are **open 24 hours** can be of great benefit to people accessing London's night-time economy. These, whether permanent or temporary, should provide facilities which can be used by disabled people and people of all genders.

5.6.6 Public toilet facilities, whether provided inside buildings or externally, should be safe, well-lit and clean. Surveillance of entrances is an important consideration when planning facilities. Ongoing **management and cleaning** of facilities should be secured and agreed at the planning stage to ensure long-term provision is achievable.

5.6.7 Standard wheelchair accessible toilets do not meet the needs of all disabled people. People with profound and multiple impairments, learning disabilities, and

other impairments such as spinal injuries, muscular dystrophy, multiple sclerosis or acquired brain injury, often need extra facilities to allow them to use a toilet comfortably. **Changing Places toilets** are different to standard accessible toilets as they are designed for assisted use, are larger, and have additional features. Without Changing Places toilets many people are limited in terms of how long they can be away from home, or where they can go. The provision of Changing Places toilets can open up new areas and experiences for people with profound and multiple impairments, and their companions, removing the barrier that the lack of provision can create.

5.6.8 **Further guidance** on the design of Changing Places toilets can be found in British Standard BS8300-2:2018. Changing Places toilets are not designed for independent use and should be provided in addition to standard unisex disabled persons' toilets, baby change and family facilities, not as a substitution.

Policy S7 Burial space

A When preparing Development Plans, boroughs should ensure provision is made for the different burial needs and requirements of London's communities, including for those groups for whom burial is the only option. This should be informed by a needs assessment of burial space, including an audit of existing provision and opportunities for the re-use of burial space. Cross-borough and/or sub-regional working is encouraged where appropriate to identify and address the requirements of these groups and to tackle burial space shortages within the sub-region.

B Development proposals for new burial provision should be supported. This may include provision in one borough to assist faith groups from another borough that are facing burial space shortages. Development proposals resulting in the loss of burial provision should only be supported if it can be demonstrated that there is no ongoing or future demand.

5.7.1 In assessing the requirements for burial space, a borough's needs assessment should take account of the fact that different faith groups have **different needs for burial provision**. In London, the demand for burial space for particular faith groups is not always well matched with the availability of burial space. Some

boroughs have little or no burial space available.[93] For inner London boroughs, this requires them to seek provision in outer London or beyond. This can cause problems of access and cost which has a disproportionate effect on London's poorest communities. It also risks undermining community cohesion and social integration.

5.7.2 To address these issues, the principle of proximity is supported as a general rule to provide burial space near residents, reducing costs/travel time to visit burial sites. However, there may be cases where meeting the needs of residents in one borough may require burial provision to be located in another borough. This may require a **sub-regional collaborative approach** to the provision of burial space, which in turn should inform a borough's assessment of current cemetery demand and site allocations for cemeteries in their Development Plans. The use of cross-borough agreements for collaboration are encouraged.

5.7.3 The **re-use of graves** can provide some additional capacity. Both Section 74 of the Local Authorities Act 2007 and Section 25 of the Burial Act 1857 allow for the re-use of graves in certain circumstances and boroughs are encouraged to actively examine the potential that re-use offers them. The unique heritage and archaeological qualities of cemeteries should be taken into account when providing additional capacity in existing cemeteries.

5.7.4 Ensuring that community and cultural facilities and services required to meet local needs are planned for and provided is one of the core principles of the planning system. Evidence demonstrates that the **shortage of burial space** in London is reaching a critical stage in many boroughs.[94] Boroughs should therefore retain their existing provision, unless it can be demonstrated there is no ongoing or future demand. A borough's needs assessment should be used to inform this decision. The construction of new buildings in the Green Belt is inappropriate except for a limited number of uses. These include provision of appropriate facilities for cemeteries as long as they preserve the openness of the Green belt and do not conflict with the purposes of including land within it. This also applies to Metropolitan Open Land.

93 An Audit of London Burial Provision – A report for the Greater London Authority by Julie Rugg and Nicholas Pleace, Cemetery Research Group University of York, 2011, available from https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports

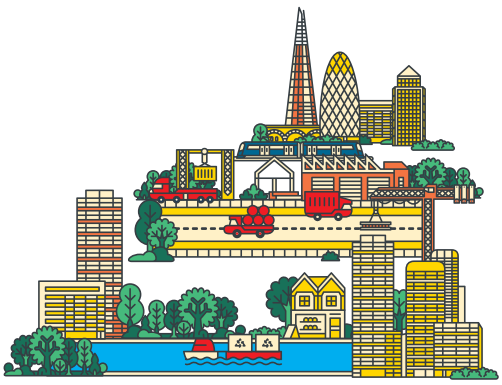
94 An Audit of London Burial Provision – A report for the Greater London Authority by Julie Rugg and Nicholas Pleace, Cemetery Research Group University of York, 2011, available from https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports

5.7.5 When making new provision, boroughs are encouraged to take into account the Mayor's broader aims for **green infrastructure and the natural environment**, including, but not limited to, the creation of new parks and open spaces, the enhancement of existing open spaces and natural environments, and the provision of enhanced links to London's green infrastructure. New burial provision that supports environmentally friendly burial practices such as woodland or parkland burial grounds can offer broad burial provision as well as wider public access. Amenity provision and environmental enhancements should be encouraged.

5.7.6 Boroughs should continue to make traditional burial provision but **innovative approaches** to the provision of community burial space, particularly in inner London, may also need to be taken. These could include creating public gardens for the burial of ashes on underused pockets of open land, parkland and brownfield land. Such gardens could also offer broader community utility, improved amenity provision and environmental enhancement.

Chapter 6

Economy



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Policy E1 Offices

A Improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.

B Increases in the current stock of offices should be supported in the locations in Parts C and D below.

C The unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ, NIOD (Northern Isle of Dogs) and other nationally-significant office locations (such as Tech City and Kensington & Chelsea), should be developed and promoted. These should be supported by improvements to walking, cycling and public transport connectivity and capacity. Future potential reserve locations for CAZ-type office functions are identified at Stratford and Old Oak Common, capitalising on their current and potential public transport connectivity to central London, the UK and beyond.

D The diverse office markets in outer and inner London (outside the areas identified in Part C) should be consolidated and – where viable – extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity including:

1) the strategic outer London office location at Croydon town centre
2) other town centre office locations (having regard to the Town Centre Network office guidelines in Table A1.1 and Figure A1.4 in Annex 1)
3) existing urban business parks (such as Chiswick Park, Stockley Park and Bedfont Lakes), taking steps towards greater transport sustainability of these locations
4) locally-oriented, town centre office provision to meet local needs.

E Existing viable office floorspace capacity in locations outside the areas identified in Part C should be retained, supported by borough Article 4 Directions to remove permitted development rights where appropriate, facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses.

F Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ, NIOD, Tech City, Kensington & Chelsea and geographically-defined parts of other existing and viable strategic and local office clusters (such as those in and around the CAZ, in town centres and other viable business locations – see Part D3 above) are not undermined by office to residential permitted development rights.

G Development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace.

H The scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored.

I The redevelopment, intensification and change of use of surplus office space to other uses including housing is supported, subject to the provisions of Parts G and H.

6.1.1 London has a **diverse range of office markets**[95] with agglomerations of nationally and internationally significant office functions in the Central Activities Zone, Northern Isle of Dogs, Kensington & Chelsea and Tech City, complemented by strategic town centre office locations in inner and outer London and locally-oriented provision in other town centres across the whole of the capital.

6.1.2 The office market is going through a **period of restructuring** with increasing numbers of micro, small and medium-sized enterprises (SMEs), changing work styles supported by advances in technology, and new forms of accommodation such as flexible and co-working space.[96] Office employment projections suggest an increase of 619,300 jobs, from 1.98 million in 2016 to 2.60 million in 2041, a rise of 31 per cent.[97] This could translate into demand for between 4.7 and 6.1 million sq.m. of office floorspace over the period 2016 to 2041 (Table 6.1). It is important that the planning process does not compromise potential growth and so Table 6.1 provides a broad monitoring benchmark which needs to be set against other drivers such as development trends, employment densities, rents, take-up and vacancy.

95 Offices include uses falling within Use Class B1a and office-related B1b.

96 London Office Policy Review, Ramidus Consulting, 2017; Supporting places of work: incubators, accelerators, co-working spaces, URS, Ramidus, #1Seed and Gort Scott, 2014

97 Ramidus Consulting, 2017 op cit

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Table 6.1 - Projected office employment and floorspace demand 2016-2041

Location	Office employment growth 2016-2041		Office floorspace demand 2016-2041
	Total	% of total growth	Gross Internal Area (million sq.m.)
Outer London	142,200	23%	0.3 – 1.5
CAZ and NIOD	367,700	59%	3.5
Inner London (outside CAZ+NIOD)	109,400	18%	1.0 – 1.1
London total	619,300	100%	4.7 – 6.1

Source: Ramidus Consulting, 2017 (Note: numbers may not sum due to rounding)

6.1.3 The projections indicate that the CAZ boroughs and some parts of **inner London** will continue to see growth in office employment and development of new office floorspace, driven by agglomeration economies, high value-added activities and viability of new space. There is broadly sufficient capacity to accommodate this demand in the CAZ and Northern Isle of Dogs complemented by Tech City and Kensington & Chelsea, although there are sub-markets within these areas where demand may exceed capacity.[98] Stratford and Old Oak Common are identified as potential future reserves for CAZ-related office capacity.

6.1.4 **Outer London** will see growth in office employment but the development of significant new office floorspace is anticipated to be focused in selected locations, particularly in west and south London (Figure A1.4) and where values are sufficient to make new office development viable. Office growth in these locations should be supported by improvements to walking, cycling and public transport connectivity and capacity.

6.1.5 It is important to ensure that there is sufficient space to support the growth of new start-up companies and to accommodate SMEs, including lower-cost and affordable business space. Development Plans and development proposals should support the provision of **space suitable for SMEs** in light of strategic and local assessments of demand and supply.

98 London Employment Sites Database, CAG Consulting, 2017 and Ramidus 2017 op cit..

6.1.6 Outside the office to residential permitted development rights (PDR) exemption areas, more than 1.9 million sq.m. of office space had received prior approval to change to residential by March 2018[99] mostly, but not exclusively, in town centres in west and south London and in areas around the CAZ fringe. There are concerns that **office to residential PDR** is having disproportionate impacts on occupied office floorspace and on SMEs and that it could undermine the potential to deliver significantly more housing through more intensive forms of mixed-use development, particularly in town centres. This Plan therefore supports boroughs to consult upon and introduce Article 4 Directions for the areas currently exempted in and around the CAZ and for geographically-defined parts of other existing and viable strategic and local office locations, to ensure that their office functions are not undermined by office to residential PDR and to protect local amenity or the wellbeing of an area.

6.1.7 **Surplus office space** includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local Development Plan Document). This evidence should be used to inform viability assessments.

Policy E2 Providing suitable business space

A Boroughs should include policies in local Development Plan Documents that support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.

B Development of B Use Class business uses should ensure that the space is fit for purpose having regard to the type and use of the space.

C Development proposals that involve the loss of existing B Use Class business space (including creative and artists' workspace) in areas identified in a local Development Plan Document where there is a shortage of lower-cost space or workspace of particular types, uses or sizes, should:

99 London Development Database

1) demonstrate that there is no reasonable prospect of the site being used for business purposes, or

2) ensure that an equivalent amount of B Use Class business space is re-provided in the proposal which is appropriate in terms of type, use and size, incorporating existing businesses where possible, and include affordable workspace where appropriate (see Policy E3 Affordable workspace).

D Development proposals for new B Use Class business floorspace greater than 2,500 sq.m. (gross external area), or a locally determined lower threshold in a local Development Plan Document, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.

6.2.1 The provision of a **sufficient supply of business space of different types, uses and sizes** will ensure that workspace is available for occupation by SMEs and businesses wishing to start-up or expand. It will also help to ensure that workspace is available at an appropriate range of rents.

6.2.2 Development of business uses should ensure that the space is fit for purpose, with at least basic fit-out, and not compromised in terms of layout, street frontage, floor loading, floor to ceiling heights and servicing, having regard to the type and use of the space. This should take into account the varied operational and servicing requirements of different business uses.

6.2.3 Smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. To support a **diverse economy**, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole. There is evidence that the conversion of occupied or partially-occupied offices to residential use, through permitted development rights, is having a particular impact on secondary space in outer London and on the fringes of the CAZ.[100]

6.2.4 **Low-cost business space** refers to secondary and tertiary space that is available at open market rents, which is of a lower specification than prime space,[101] or found in non-prime locations such as back-of-town centre and

100 Ramidus Consulting, 2017 op cit / London Development Database monitoring

101 See Glossary for definitions of Prime, secondary and tertiary commercial property

high street locations, railway arches, heritage buildings in the CAZ, and smaller-scale provision in industrial locations. It usually commands rents at or below the market average.

6.2.5 Part B of this policy is intended to operate in those parts of London where there is evidence in a local Development Plan Document of particular **shortages of business space** available for occupation, including lower-cost space. It supports the life-cycle of prime, secondary and tertiary business space over the longer term by securing the re-provision of capacity at open market rents and the provision of affordable workspace at rents maintained below the market rate where appropriate – (see Policy E3 Affordable workspace). It will be most effective in those parts of London where boroughs have removed office or light industrial to residential permitted development rights through Article 4 Directions.

6.2.6 Larger-scale commercial development proposals should consider the scope to incorporate a **range of sizes of business units**, including for SMEs. Flexible workspace can include a variety of types of space including serviced offices, co-working space[102] and hybrid industrial space for B1c/B2/B8 uses. What constitutes a reasonable proportion of workspace suitable for SMEs should be determined on the circumstances of each case.

6.2.7 If business space is demonstrated to be obsolete or surplus to requirements (see paragraphs 6.1.7 and 6.7.5), it should be **redeveloped for housing and other uses**.

Policy E3 Affordable workspace

A In defined circumstances set out in Parts B and C below, planning obligations may be used to secure affordable workspace (in the B Use Class) at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose such as:

1) for specific sectors that have social value such as charities, voluntary and community organisations or social enterprises
2) for specific sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace
3) for disadvantaged groups starting up in any sector

102 Ramidus Consulting, 2017 op cit section 2.3

4) supporting educational outcomes through connections to schools, colleges or higher education

5) supporting start-up and early stage businesses or regeneration.

B Consideration should be given to the need for affordable workspace for the purposes in Part A above:

1) where there is affordable workspace on-site currently, or has been at any time since 1 December 2017, except where it is demonstrated that the affordable workspace has been provided on a temporary basis pending redevelopment of the site

2) in areas identified in a local Development Plan Document where cost pressures could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones)

3) in locations identified in a local Development Plan Document where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.

C Boroughs, in their Development Plans, should consider detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations or defining areas of need for certain kinds of affordable workspace.

D Affordable workspace policies defined in Development Plans and the terms set out in Section 106 agreements should ensure that the objectives in Part A above are monitored and achieved, including evidence that the space will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Applicants are encouraged to engage with workspace providers at an early stage in the planning process to ensure that the space is configured and managed efficiently.

E Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in Part A, over the long-term.

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6.3.1 It is important that London continues to **generate a wide range of economic and other opportunities**, to ensure that London is a fairer, more inclusive and more equal city. The cost of workspace in London is particularly high relative to other parts of the UK and to ensure that all types of development needed to support the economy can be accommodated there is a need for affordable workspace for some economic, social and cultural uses that cannot afford to operate at open market rents and to support start-up or early stage businesses.

6.3.2 Affordable workspace is defined here as workspace that is provided at **rents maintained below the market rate** for that space **for a specific social, cultural, or economic development purpose**. It can be provided and/or managed directly by a dedicated workspace provider, a public, private, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured in perpetuity or for a period of at least 15 years by planning or other agreements.

6.3.3 Affordable workspace may **help support educational outcomes**, for example by businesses providing apprenticeships and work experience, offering mentoring by entrepreneurs and/or providing space for further and higher education leavers to develop academic work into businesses. It may also be linked with business support and skills training.

6.3.4 As well as ensuring a sufficient supply of affordable business space, the Mayor also wishes to support sectors that have **cultural or social value** such as artists, designer-makers, charities, voluntary and community organisations and social enterprises for which low-cost space can be important. Therefore, in certain specific circumstances, as set out in Part A, there may be a need to secure affordable workspace as part of new development.

6.3.5 Social, cultural, or economic development objectives can be set in **planning obligations**, or by ensuring workspace providers are on a Local Authority framework panel or accredited list. Arrangements for engaging a provider, how the space will be owned or leased and the process for review, changes in terms, disposal or termination, should be agreed with the Local Planning Authority. When drawing up local Development Plan policies, boroughs are encouraged to draw on the experience of local workspace providers to understand the nature of demand in an area. Planning obligations used to secure affordable workspace in mixed use schemes should include mechanisms to ensure its timely delivery. It may be appropriate to require this in advance of some or all residential elements being occupied.

6.3.6 Landowners sometimes provide affordable workspace on a voluntary and temporary basis prior to the redevelopment of a site. This provision makes good use of sites that may otherwise remain vacant. The **temporary use** of

a site should generally be secured through a temporary planning permission and must not result in an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. Parameters for any temporary use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.

6.3.7 The Mayor will encourage the delivery of new workspace for **SMEs, the creative industries, artists and the fashion industry** within new residential and mixed-use developments. He will also provide assistance to artists and creative businesses through the Mayor's Creative Enterprise Zones (see Policy HC5 Supporting London's culture and creative industries) and promote schemes that provide linked affordable housing and affordable workspace in new housing developments.

Policy E4 Land for industry, logistics and services to support London's economic function

A A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see Policy E7 Industrial intensification, co-location and substitution). This should make provision for the varied operational requirements of:

1) light and general industry (Use Classes B1c and B2)
2) storage and logistics/distribution (Use Class B8) including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points
3) secondary materials, waste management and aggregates
4) utilities infrastructure (such as energy and water)
5) land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
6) wholesale markets
7) emerging industrial-related sectors

8) flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population

9) low-cost industrial and related space for micro, small and medium-sized enterprises (see also Policy E2 Providing suitable business space)

10) research and development of industrial and related products or processes (falling within Use Class B1b).

B London's land and premises for industry, logistics and services falls into three categories:

1) Strategic Industrial Locations (SIL) – see Policy E5 Strategic Industrial Locations (SIL)

2) Locally Significant Industrial Sites (LSIS) - see Policy E6 Locally Significant Industrial Sites

3) Non-Designated Industrial Sites[103] - see Part C of Policy E7 Industrial intensification, co-location and substitution.

C The retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B should be planned, monitored and managed. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Industrial intensification, co-location and substitution and supported by Policy E5 Strategic Industrial Locations (SIL).

D The retention, enhancement and provision of additional industrial capacity should be prioritised in locations that:

1) are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport

2) provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population

3) provide capacity for micro, small and medium-sized enterprises

103 Sites containing industrial and related functions that are not formally designated as SIL or LSIS in a Local Plan

4) are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision

5) support access to supply chains and local employment in industrial and related activities.

E Any release of industrial capacity in line with Part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.

F Efficient wholesale market functions should be retained to meet London's requirements whilst enabling opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs.

G Boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate.

6.4.1 London depends on a **wide range of industrial, logistics and related uses** that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system which can respond to business and consumer demands[104].

6.4.2 **Wholesale markets** have historically played an important role in London's economy distributing fresh products to retailers, restaurants and street markets across the capital. Their future role is affected by competition from alternative distribution systems but they are also taking advantage of trends towards increased eating out and are supplying a range of products to London's diverse communities. This Plan continues to recognise their role whilst enabling

104 Keep London Working, SEGRO, 2017, http://www.segro.com/media/keeplondonworking?sc_lang=en; Industrial Revolution, Turley, 2017, https://www.turley.co.uk/comment/industrial-revolution

opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs.

6.4.3 **Industrial land and floorspace** provides the capacity for the activities described above to operate effectively. In 2015, London had an estimated 6,976 hectares[105]of land in industrial and related uses of which about 50 per cent was within SILs, a further 14 per cent was in LSIS designated by boroughs and the remaining 36 per cent was in Non-Designated Industrial Sites which are not designated in Local Plan policies maps.

6.4.4 Over the period 2001 to 2015, more than 1,300 hectares of industrial land (including SILs, LSIS and Non-Designated Industrial Sites) was released **to other uses**. This was well in excess of previously established London Plan monitoring benchmarks.[106] Research for the GLA indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041[107], mostly driven by strong demand for logistics to service growth in London's economy and population. The GLA's assessment indicates that after factoring in both the positive net land demands and the management of vacancy rates, there would be scope to release a further 233 hectares of industrial land over the period 2016 to 2041. However, the demand assessment shows that in 2015, 185 hectares of industrial land already had planning permission to change to non-industrial use and a further 653 hectares were earmarked for potential release in Opportunity Area Planning Frameworks, Local Plans and Housing Zones.

6.4.5 Based upon this evidence, this Plan addresses the need to provide sufficient industrial, logistics and related capacity through its policies.

6.4.6 Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence.

6.4.7 All boroughs in the Central Services Area should recognise the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable 'last mile' distribution/ logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions. This should be taken into account when assessing whether substitution is appropriate.

105 London Industrial Land Supply and Economy Study, AECOM, 2016

106 AECOM, 2016 op. cit.

107 London Industrial Land Demand Study, CAG Consultants, 2017

6.4.8 Where industrial land vacancy rates are currently above the London average, boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate if demand cannot support industrial uses in these locations. Boroughs proposing changes through a Local Plan to Green Belt or MOL boundaries (in line with Policy G2 London's Green Belt and Policy G3 Metropolitan Open Land) to accommodate their London Plan housing target should demonstrate that they have made as much use as possible of suitable brownfield sites and underutilised land, including – in exceptional circumstances – appropriate industrial land in active employment use. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.

Policy E5 Strategic Industrial Locations (SIL)

A Strategic Industrial Locations (identified in Figure 6.1 and Table 6.2) should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.

B Boroughs, in their Development Plans, should:

1) define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution (set out in Policy E7 Industrial intensification, co-location and substitution)

2) develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including improvements to access, public transport, digital connectivity and other related infrastructure) for the functions set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function

3) explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Industrial intensification, co-location and substitution).

4) strategically coordinate Development Plans to identify opportunities to substitute industrial capacity and function of Strategic Industrial Locations where evidence that alternative, more suitable, locations

exist. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan. All Boroughs are encouraged to evaluate viable opportunities to provide additional industrial land in new locations to support this process. This policy should be applied in the context of Policy E7 Industrial intensification, co-location and substitution.

C Development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function

D Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. Residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.

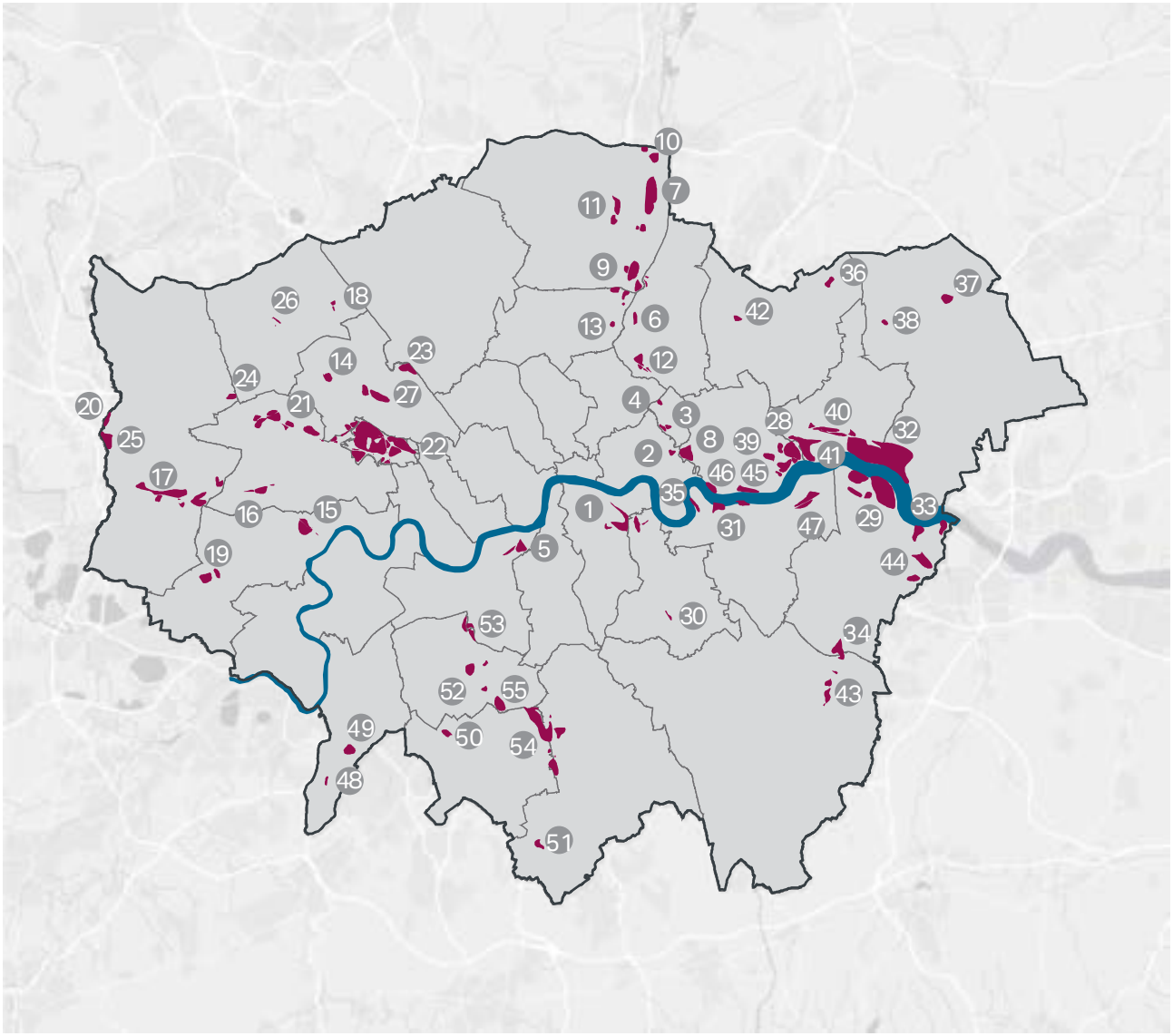
6.5.1 London's SILs, listed in Table 6.2 and illustrated in Figure 6.1, are the capital's main reservoir of land for industrial, logistics and related uses. **SILs are given strategic protection** because they are critical to the effective functioning of London's economy. They can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development.

6.5.2 SILs are important in supporting strategic logistics operations serving the capital as well as providing relatively low-cost industrial space for SMEs. Typically, they are located close to the strategic road network and many are also well-located with respect to rail, river, canals and safeguarded wharves which can support the sustainable movement of goods, construction materials and waste to, from and within London. To ensure that London can retain an efficient logistics function it is particularly important to **secure and enhance strategic provision in SILs** in west London, especially at Park Royal and around Heathrow; in north London in the Upper Lee Valley; in east London, north and south of the Thames; and in the Wandle Valley in south London. This should be

complemented by smaller-scale provision in LSIS and Non-Designated Industrial Sites including sustainable 'last mile' distribution close to central London.

6.5.3 **Innovations** to make more effective use of land in SILs are encouraged and should be explored in Local Plan reviews and Opportunity Area Planning Frameworks. This includes collaborative working with other planning authorities in the relevant property market areas including authorities in the Wider South East (see also Policy E7 Industrial intensification, co-location and substitution). This should take into account the potential to rationalise areas of SIL that are currently in non-industrial and related uses or contain transport or utilities uses which are surplus to requirements. The Thames Gateway provides the greatest scope for strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates, particularly in the boroughs of Newham and Barking & Dagenham.

Figure 6.1 - Strategic Industrial Locations



Strategic Industrial Locations

● Strategic Industrial Locations (SIL)

References refer to Table 6.2

Source: GLA Planning

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Table 6.2 - Strategic Industrial Locations

Ref.	Location	Industrial Property Market Area	Planning Authority
1	Bermondsey / Old Kent Road / Surrey Canal Area	Central Services Area	Southwark / Lewisham
2	Empson Street	Central Services Area	Tower Hamlets
3	Fish Island / Marshgate Lane	Central Services Area	LLDC (Newham/ Tower Hamlets)
4	Hackney Wick	Central Services Area	LLDC (Hackney)
5	Queenstown Road, Battersea	Central Services Area	Wandsworth
6	Blackhorse Lane	Lee Valley	Waltham Forest
7	Brimsdown	Lee Valley	Enfield
8	British Gas Site / Cody Road	Lee Valley	Newham
9	Central Leaside Business Area	Lee Valley	Enfield / Haringey / Waltham Forest
10	Freezywater / Innova Park	Lee Valley	Enfield
11	Great Cambridge Road	Lee Valley	Enfield
12	Lea Bridge Gateway	Lee Valley	Waltham Forest
13	Tottenham Hale	Lee Valley	Haringey
14	East Lane	Park Royal / Heathrow	Brent
15	Great West Road / Brentford – Transport Avenue	Park Royal / Heathrow	Hounslow
16	Great Western	Park Royal / Heathrow	Ealing
17	Hayes Industrial Area	Park Royal / Heathrow	Hillingdon
18	Honeypot Lane, Stanmore	Park Royal / Heathrow	Harrow
19	North Feltham Trading Estate	Park Royal / Heathrow	Hounslow
20	North Uxbridge Industrial Estate	Park Royal / Heathrow	Hillingdon
21	Northolt, Greenford, Perivale	Park Royal / Heathrow	Ealing
22	Park Royal	Park Royal / Heathrow	OPDC (Brent / Ealing / Hammersmith & Fulham)

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Ref.	Location	Industrial Property Market Area	Planning Authority
23	Staples Corner	Park Royal / Heathrow	Brent
24	Stonefield Way / Victoria Road	Park Royal / Heathrow	Hillingdon
25	Uxbridge Industrial Estate	Park Royal / Heathrow	Hillingdon
26	Wealdstone Industrial Area	Park Royal / Heathrow	Harrow
27	Wembley	Park Royal / Heathrow	Brent
28	Beckton Riverside	Thames Gateway	Newham
29	Belvedere Industrial Area	Thames Gateway	Bexley
30	Bromley Road	Thames Gateway	Lewisham
31	Charlton Riverside	Thames Gateway	Greenwich
32	Dagenham Dock / Rainham Employment Area	Thames Gateway	Barking & Dagenham / Havering
33	Erith Riverside	Thames Gateway	Bexley
34	Foots Cray Business Area	Thames Gateway	Bexley / Bromley
35	Greenwich Peninsula West	Thames Gateway	Greenwich
36	Hainault Industrial Estate	Thames Gateway	Redbridge
37	Harold Hill Industrial Estate	Thames Gateway	Havering
38	King George Close Estate, Romford	Thames Gateway	Havering
39	London Industrial Park	Thames Gateway	Newham
40	Rippleside	Thames Gateway	Barking & Dagenham
41	River Road Employment Area	Thames Gateway	Barking & Dagenham
42	Southend Road Business Area	Thames Gateway	Redbridge
43	St Mary Cray	Thames Gateway	Bromley
44	Thames Road, including Crayford Industrial Area	Thames Gateway	Bexley
45	Thameside East	Thames Gateway	Newham
46	Thameside West	Thames Gateway	Newham
47	West Thamesmead / Plumstead Industrial Area (including White Hart Triangle)	Thames Gateway	Greenwich
48	Barwell Business Park	Wandle Valley	Kingston
49	Chessington Industrial Estate	Wandle Valley	Kingston
50	Kimpton Industrial Area	Wandle Valley	Sutton
51	Marlpit Lane	Wandle Valley	Croydon
52	Morden Road Factory Estate and Prince George's Road	Wandle Valley	Merton

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Ref.	Location	Industrial Property Market Area	Planning Authority
53	North Wimbledon / Garrett Business Park (Summerstown)	Wandle Valley	Merton / Wandsworth
54	Purley Way and Beddington Lane Industrial Area	Wandle Valley	Croydon / Sutton
55	Willow Lane, Beddington and Hallowfield Way	Wandle Valley	Merton

Policy E6 Locally Significant Industrial Sites

A In their Development Plans, boroughs should:

1) designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (set out in Policy E7 Industrial intensification, co-location and substitution)

2) make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses.

6.6.1 Boroughs may designate locations that have particular local importance for industrial and related functions as Locally Significant Industrial Sites. These **designations should be based on evidence** in strategic and local demand assessments and should complement provision in SILs. Inner London sites providing sustainable distribution services for the Central Activities Zone and Northern Isle of Dogs may be particularly appropriate for this designation.

Policy E7 Industrial intensification, co-location and substitution

A Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:

1) introduction of small units
2) development of multi-storey schemes
3) addition of basements
4) more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary.

B Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in Part D below. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications. In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered. This should also be part of a plan-led or masterplanning process.

C Mixed-use or residential development proposals on Non-Designated Industrial Sites should only be supported where:

1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function; or
2) it has been allocated in an adopted local Development Plan Document for residential or mixed-use development; or
3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification (see also Part C of Policy E2 Providing suitable business space).

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Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Part D below.

D The processes set out in Parts B and C above must ensure that:

1) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
2) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied
3) appropriate design mitigation is provided in any residential element to ensure compliance with 1 above with particular consideration given to:
    a) safety and security
    b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict
    c) design quality, public realm, visual impact and amenity for residents
    d) agent of change principles
    e) vibration and noise
    f) air quality, including dust, odour and emissions and potential contamination.

E Development Plans and planning frameworks should consider, in collaboration with the GLA and neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:

1) this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land
2) full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles

3) a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements, where relevant, is in place to support this process.

This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) and not through ad hoc planning applications.

6.7.1 In collaboration with the Mayor, all boroughs are encouraged to explore the potential to **intensify industrial activities**[108] on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses. Through Local Plans, boroughs should also take a proactive approach to the **management of vacancy rates** to reach a level appropriate to the efficient functioning of the industrial market (considered to be five per cent for land and eight per cent for floorspace).[109]

6.7.2 There may be scope for selected parts of SILs or LSISs to be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the **release of some land** for a mix of uses including residential. Local Plan policies' maps and/or OAPFs and masterplans (as relevant) should indicate clearly:

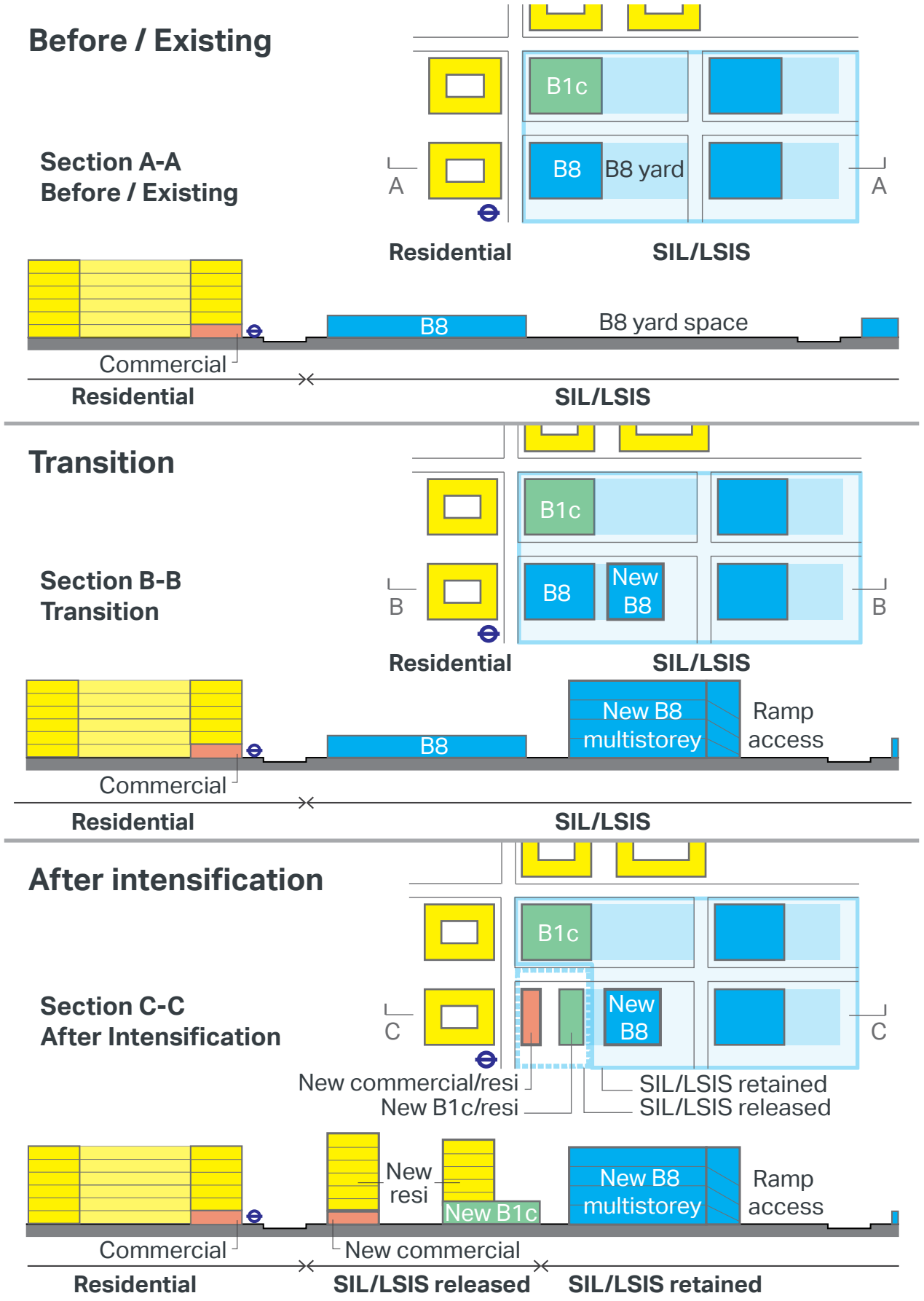
i. the area to be retained, substituted and/or intensified as SIL or LSIS (and to provide future capacity for the uses set out in Policy E5 Strategic Industrial Locations (SIL) and Policy E6 Locally Significant Industrial Sites) and

ii. the area to be released from SIL or LSIS (see illustrative examples in Figure 6.2). Masterplans should cover the whole of the SIL or LSIS, and should be informed by the operational requirements of existing and potential future businesses.

108 Industrial Intensification Primer, GLA, 2017; London Industrial Land Demand Study, CAG Consultants, 2017

109 London Industrial Land Demand Study, CAG Consultants, 2017; Land for Industry and Transport SPG, GLA, 2012

Figure 6.2 - Simplified illustrations of approaches to SIL/LSIS



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6.7.3 These approaches may be supported by **land swaps** within the SIL or LSIS, within the borough or in collaboration with neighbouring authorities. To ensure that such development works effectively, there should be a development agreement in place between the industrial developer and associated (non-industrial) developers.

6.7.4 Outside of areas designated as SIL or LSIS there may be opportunities to deliver co-location involving a **mix of industrial and residential** and/or other uses on the same site either side-by-side or through vertical stacking.

6.7.5 Evidence to demonstrate '**no reasonable prospect**' of Non-Designated Industrial Sites being used for industrial and related purposes should include:

- strategic and local assessments of demand
- evidence of vacancy and marketing with appropriate lease terms and at market rates suitable for the type, use and size (for at least 12 months, or greater if required by a local Development Plan Document), and where the premises are derelict or obsolete, offered with the potential for redevelopment to meet the needs of modern industrial users
- evidence that the scope for mixed-use intensification with industrial uses has been explored fully.

6.7.6 There is a significant amount of industrial and logistics capacity serving London that is located outside of the capital.[110] There may be scope for some **substitution**[111] of London's industrial capacity to locations in the wider region where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvements. This will require close collaboration between planning authorities inside and outside London and must ensure that any substitution does not give rise to cumulative negative impacts including, for example, on business supply chains, labour markets, pollution and congestion.[112]

6.7.7 **Collaborative working** between the Mayor, boroughs and other stakeholders on Development Plan reviews, planning frameworks and masterplans provides useful mechanisms to co-ordinate these processes. This should ensure that the need to maintain sufficient capacity for industry to service London's economy and residents is considered alongside other planning objectives including

110 AECOM 2016, op. cit.

111 The term 'substitution' refers here to making provision of land and floorspace to accommodate business uses in alternative locations outside London to meet projected future demand.

112 London Industrial Land Demand Study, CAG Consultants, 2017; Industrial Land and Transport Study, Peter Brett Associates, 2017

delivery of strategic infrastructure, housing, social infrastructure and other uses. Further advice on the implementation of Policy E7 Industrial intensification, co-location and substitution will be provided in Supplementary Planning Guidance.

Policy E8 Sector growth opportunities and clusters

A Employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities.

B London's global leadership in tech across all sectors should be maximised.

C The evolution of London's diverse sectors should be supported, ensuring the availability of suitable workspaces including:

1) start-up, incubation and accelerator space for micro, small and medium-sized enterprises
2) flexible workspace such as co-working space and serviced offices
3) conventional space for expanding businesses to grow or move on
4) laboratory space and theatre, television and film studio capacity
5) affordable workspace in defined circumstances (see Policy E3 Affordable workspace).

D Innovation, including London's role as a location for research and development should be supported, and collaboration between businesses, higher education providers and other relevant research and innovation organisations should be encouraged.

E London's higher and further education providers and their development across all parts of London should be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged.

F Clusters such as Tech City and MedCity should be promoted and the development of new clusters should be supported where opportunities exist, such as CleanTech innovation clusters, Creative Enterprise Zones, film, fashion and design clusters, and green enterprise districts such as in the Thames Gateway.

G In collaboration with the Mayor, boroughs are encouraged to identify and promote the development of Strategic Outer London Development Centres (SOLDC) that have one or more specialist economic functions of greater than sub-regional importance. SOLDCs should be supported by:

1) encouraging local innovation to identify and enhance distinct economic strengths
2) co-ordinating infrastructure investment
3) creating a distinct and attractive business offer and public realm
4) ensuring that development complements the growth of town centres and other business locations, and supports the environmental and transport objectives of this Plan
5) bringing forward development capacity
6) improving Londoners' access to employment opportunities.

H Boroughs are encouraged to identify and support the growth of sustainably-located employment clusters in inner and outer London.

6.8.1 The Mayor wants London to continue to provide the best environment in the world in which to do business, so that businesses of all different sizes and sectors can reach their growth potential. This includes **supporting business and employment across all sectors** of the economy and capitalising on new growth opportunities in emerging sectors.

6.8.2 This Plan provides the planning framework to complement the **Mayor's Economic Development Strategy** (EDS) to ensure that the varied innovation and workspace requirements of London's businesses are met. This includes the retention and provision of flexible and other forms of workspace to support start-up, existing and growing SMEs. Incubator, accelerator and co-working spaces can provide support and collaboration opportunities for fledgling and growing businesses. Support should meet the requirements of a broad range of SMEs and, in particular, should be tailored to provide opportunities for women and people from BAME backgrounds.

6.8.3 In the EDS, the Mayor has identified a number of sector-specific opportunities and challenges that require a more targeted approach where he believes there are specific business growth opportunities. These include:

- **advanced urban services** – such as architecture, urban design, planning, engineering, property development, energy and transport. The application

of data and new technologies to these disciplines has the potential to make London work better as a city, or 'smarter', to become more productive, sustainable and liveable. The Mayor wants London to be a global test-bed for 'smart city' solutions, including improving the way people access public services. To support this, he will help to establish common standards for collecting data and make more data open to the public

- **culture and creative industries** – building on London's particular strengths in film, fashion and design, with clusters emerging across the city (including Creative Enterprise Zones – see Policy HC5 Supporting London's culture and creative industries), and the Mayor's vision to turn the Thames Estuary into a 'Production Corridor', developing facilities for artistic and creative production from East London to Southend and into Kent
- **financial and business services** – sustaining London's position as a global financial services hub along with a diverse range of professional and business services including legal services, accounting and management consultancy (see Policy E1 Offices)
- **life sciences** - London, Cambridge and Oxford form the "golden triangle" – a world-leading inter-connected region for life sciences research, development, manufacturing and commercialisation. MedCity – a collaboration between London, Cambridge and Oxford Academic Health Science Centres, co-funded by the Mayor – seeks to promote and grow this life sciences cluster. Development Plans should support the range of existing and proposed medical and life sciences research districts associated with MedCity such as those around the Euston Road (including the Francis Crick Institute, Wellcome Trust and University College Hospital); Imperial College London's White City Campus; around Whitechapel, associated with Queen Mary University of London; and the London Cancer Hub. Within this sector there is particular demand for affordable 'grow-on' space (including laboratory space) to ensure London retains the innovations emerging from London-based universities. The networks and facilities that support London's role as a centre of medical excellence should also be supported
- **low carbon and environmental goods and services sector** – building on London's existing strengths in areas such as carbon finance, geothermal, wind energy, building technologies, alternative fuels, photovoltaics and waste management. The Mayor will support businesses to adopt the principles of the circular economy as set out in Policy SI 7 Reducing waste and supporting the circular economy. The Mayor will also support the growth of London's CleanTech sector across London. West London in particular offers a unique set of opportunities to support the growth of this sector, with the

development of a major innovation campus by Imperial College London at White City, and the simultaneous redevelopment of Old Oak and Park Royal into a smart and sustainable district

- **tech and digital sector** – which supports the growth and evolution of all sectors in the economy. Planning should ensure that new developments have the digital connectivity required to support London's global competitiveness (see Policy SI 6 Digital connectivity infrastructure). In the City Fringe, the Tech City cluster should be supported as one of London's nationally-significant office locations and complemented by Development Plan policies to enable entrepreneurs to locate and expand there and to provide the flexibility and range of space that this sector needs, including affordable space. The Mayor will support the growth of the tech and digital sector across all of London
- **tourism** – which gives London an international profile – attracting people from across the world – and showcases London as a diverse and open city (see also Policy E10 Visitor infrastructure).

6.8.4 The Mayor also supports measures to secure and develop **London's leading role as a centre of higher and further education** of national and international importance. London's higher and further education providers have considerable potential for innovation supported by collaboration between businesses, the public sector and other relevant research organisations. These initiatives can act as a catalyst for economic growth and promote social mobility in areas with high levels of deprivation by creating new jobs and training opportunities for local residents, as well as supporting the growth of emerging sectors in London. The Mayor will support higher and further education providers and boroughs to identify opportunities to work in partnership to benefit from the development of higher and further education facilities.

6.8.5 The **Strategic Outer London Development Centre** (SOLDC) concept seeks to support the growth of business and employment opportunities beyond central London. This involves realising the potential of such locations to develop their specialist economic growth in ways which will help achieve the Mayor's wider objectives. Town centres offer particular advantages for some specialist activities but the SOLDC concept can apply to a range of business locations including industrial areas. The approach is designed to encourage local innovation whilst ensuring that it supports and complements the economic prospects of neighbouring town centres including those in adjacent boroughs.

6.8.6 **Implementation** of the SOLDC concept will involve actions from a range of partners in light of local circumstances on matters including (but not exclusive to):

- Development Plans and frameworks (including Opportunity Area Planning Frameworks, local Area Action Plans and Town Centre strategies)
- strategic infrastructure plans
- new development and refurbishment
- public transport connectivity and capacity upgrades
- other infrastructure
- management and investment (including Business Improvement Districts)
- improvements to the business environment and public realm
- promotion, branding and marketing.

6.8.7 Boroughs across London contain a rich variety of employment areas, including industrial estates, high streets and areas within and on the edge of town centres, which provide locations and opportunities for **locally significant sectors and clusters of businesses**. These are important for local economies and provide diverse employment opportunities for local residents. Boroughs are encouraged to identify these sectors and clusters and set out policies in Local Plans that support their growth, having regard in particular to public transport provision and ensuring the vitality and viability of town centres.

Policy E9 Retail, markets and hot food takeaways

A A successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres (Policy SD6 Town centres and high streets, Policy SD8 Town centre network, Policy SD7 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation).

B In Development Plans, boroughs should:

1) identify future requirements and locations for new retail development having regard to the town centre policies in this Plan and strategic and local evidence of demand and supply
2) identify areas for consolidation of retail space where this is surplus to requirements

3) set out policies and site allocations to secure an appropriate mix of shops and other commercial units of different sizes, informed by local evidence and town centre strategies. Particular consideration should be given to the contribution large-scale commercial development proposals (containing over 2,500 sq.m. gross A Use Class floorspace) can make to the provision of small shops and other commercial units. Where justified by evidence of local need, policies should secure affordable commercial and shop units.

C Development Plans and development proposals should:

1) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres

2) support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel

3) provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping

4) identify areas under-served in local convenience shopping and related services and support additional facilities to serve existing or new residential communities in line with town centre Policy SD7 Town centres: development principles and Development Plan Documents

5) support London's markets in their full variety, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres and the Central Activities Zone

6) manage existing edge-of-centre and out-of-centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses in line with Policy SD6 Town centres and high streets, Policy Policy SD8 Town centre network, Policy SD7 Town centres: development principles and Development Plan Documents and Policy SD9 Town centres: Local partnerships and implementation to realise their full potential for housing intensification, reducing car use and dependency, and improving access by walking, cycling and public transport

7) manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including:
   a) town centre vitality, viability and diversity
   b) sustainability and accessibility
   c) place-making or local identity
   d) community safety or security
   e) mental and physical health and wellbeing.

D Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also carefully manage the over-concentration of A5 hot food takeaway uses within town centres and other areas through the use of locally-defined thresholds in Development Plans.

E Where development proposals involving A5 hot food takeaway uses are permitted, boroughs should encourage operators to comply with the Healthier Catering Commitment standards. Where justified, boroughs should ensure compliance with the Healthier Catering Commitment through use of a condition.

F Development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable (and in accordance with town centre Policy SD7 Town centres: development principles and Development Plan Documents) and residential development.

6.9.1 A diverse and competitive retail sector that meets the needs of Londoners and visitors to the capital is important. **Retailing is undergoing restructuring** in response to recent trends and future forecasts for consumer expenditure, population growth, technological advances and changes in consumer behaviour, with increasing proportions of spending made via the internet. As a result, retailing has evolved to become multi-channel, with a mix of physical stores, often supported by internet 'click and collect' in store or deliveries to homes,

workplaces or pick-up points, and in other cases purely online businesses with no physical stores.

6.9.2 Taking into account projected growth in household, commuter and tourist spending in London, retailers making more efficient use of existing space and special forms of trading (which includes internet-related spend), it is estimated that London could have a baseline **need for additional comparison goods retailing** of around 1.6 million sq.m. over the period 2016-2041, or 1.2 million sq.m. when current schemes in the planning pipeline are taken into account.[113]

6.9.3 In preparing or reviewing Development Plans, boroughs should take into account integrated strategic and local assessments of demand and capacity for both comparison and convenience goods retailing. Boroughs should plan proactively to accommodate that demand and **manage the transition of surplus retail** (including high street frontages, purpose-built shopping centres, malls and retail parks) to other uses in line with this policy and Policy SD6 Town centres and high streets, Policy SD8 Town centre network, Policy SD7 Town centres: development principles and Development Plan Documents, while ensuring sufficient capacity for convenience retail to meet the day-to-day needs of local residents.

6.9.4 **Street markets** in London can play a valuable economic, social and cultural role[114] helping to meet Londoners' varied dietary requirements, extend choice and access to a range of goods, contribute to the vitality and viability of town centres and the character of high streets, and provide opportunities for new businesses to start-up. Several markets are of strategic importance, such as those at Portobello Road, Borough, Columbia Road and Camden for example, and offer significant attractions for Londoners and visitors to the capital. Many markets have a specialist function, serving the shopping and leisure needs of a specific ethnic group, or providing speciality products and services. Whilst the planning system can help support the range of London's markets, broader actions are often required in terms of management and investment. The Mayor has established the London Markets Board to help ensure that markets continue to flourish, support growth in town centres and associated high streets, and remain vibrant attractions for all Londoners and visitors to the capital.

6.9.5 Policy SD6 Town centres and high streets promotes a **diverse range of uses** to support the vitality and viability of town centres. Some retail and related uses when clustered can support town centres to develop niche or specialist roles and may provide important visitor attractions. Over-concentrations of some uses however, such as betting shops, pawnbrokers, pay-day loan

113 Experian, 2017 op cit.

114 Understanding London's Markets, GLA, 2017

stores, amusement centres and hot food takeaways, can give rise to particular concerns regarding the impact on mental and physical health and wellbeing, amenity, vitality, viability and diversity. The proliferation and concentration of these uses should be carefully managed through Development Plans and planning decisions, particularly in town centres that are within Strategic Areas for Regeneration (see Table A1.1), which tend to have higher numbers of these premises.[115] Boroughs may require Health Impact Assessments for particular uses.

6.9.6 Obesity is one of the greatest health challenges facing the capital. In London 38 per cent of Year 6 pupils (10 to 11 year-olds) are overweight or obese – higher than any other region in England. Children living in the most deprived areas of London are twice as likely to be obese as children living in the least deprived areas.[116] The creation of a **healthy food environment**, including access to fresh food, is therefore important. The number of hot food takeaways in London has been steadily rising, with London boroughs having some of the highest densities of hot food takeaways in England. More deprived areas commonly have a higher density of hot food takeaways than other areas.[117]

6.9.7 **Hot food takeaways** generally sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables. There is evidence that regular consumption of energy-dense food from hot food takeaways is associated with weight gain, and that takeaway food is appealing to children. It is recognised that the causes of obesity are complex and the result of a number of factors, and that a broad package of measures is required to reduce childhood obesity within London. A wide range of health experts recommend restricting the proliferation of hot food takeaways, particularly around schools, in order to help create a healthier food environment. Boroughs wishing to set a locally-determined boundary from schools should justify this using evidence provided by public health leads. Shift and night-time workers also find it particularly difficult to access healthy food due to the limited options available to them at night time.

115 London Town Centre Health Check, GLA, 2018

116 From Evidence into Action: Opportunities to Protect and Improve the Nation's Health. Public Health England, Oct. 2014, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366852/PHE_Priorities.pdf

117 Fast Food Map. Public Health England, 2016, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578041/Fast_food_map_2016.pdf

6.9.8 The **Healthier Catering Commitment**[118] is a scheme that helps food businesses in London to provide healthier food to their customers. The scheme promotes a reduction in the consumption of fat, salt and sugar, and an increase in access to fruit and vegetables. This can also help ensure there are healthier food options available for night workers.

6.9.9 Commercial activity provides opportunities for micro, small and medium-sized enterprises to establish and contribute to the diversity of town centres. Independent businesses, including shops, cafés and restaurants, play an important role in supporting the vitality and vibrancy of town centres and local communities, and many operate from smaller premises. In parts of London, **small shops and other A Class uses suitable for occupation by SMEs** may be in short supply and affordability can be a key concern. Larger developments that include a significant amount of commercial floorspace can contribute to the diversity, vitality and vibrancy of town centres by providing a range of unit sizes that includes smaller premises. The High Streets for All report found that almost 70 per cent of small businesses consider rent unaffordable[119] with average retail rents increasing 4 per cent per annum over the period 2009 to 2016.[120] Where there is local evidence of need, Development Plans should require affordable commercial and shop units (secured through planning conditions or planning obligations as appropriate).

118 The Healthier Catering Commitment, https://www.london.gov.uk/what-we-do/business-and-economy/food/our-projects-food-london/healthier-catering-commitment

119 High Streets for All, GLA, 2017

120 London Town Centre Health Check, GLA, 2017

Policy E10 Visitor infrastructure

A London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.

B The special characteristics of major clusters of visitor attractions and heritage assets and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted.

C A sufficient supply and range of serviced accommodation should be maintained.

D The provision of high-quality convention facilities in town centres and in and around the CAZ should be supported.

E Camping and caravan sites should be supported in appropriate locations.

F Within the CAZ, strategically-important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), and subject to the impact on office space and other strategic functions. Intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses.

G In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London.

H To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either:

1) 10 per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52[121] incorporating either Figure 30[122] or 33[123] of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice; or
2) 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice.[124]

121 Figure 52 illustrates an example of an accessible bedroom with en-suite sanitary facilities

122 Figure 30 illustrates requirements for a wheelchair accessible en-suite shower room with corner WC for independent use

123 Figure 33 illustrates requirements for a bathroom for independent use incorporating a corner WC layout

124 19.2.1.2 of BS8300-2:2018 specifies design and percentage requirements for accessible bedrooms including wheelchair accessible rooms with an en-suite shower room for independent use, rooms with a tracked hoist system and a connecting door to an adjoining (standard) bedroom for use by an assistant or companion, rooms with an en-suite shower room to meet the requirements of people with ambulant mobility impairments, and rooms large enough for easy adaptation to wheelchair accessible bedroom standards that are structurally capable of having grab rails installed quickly and easily.

6.10.1 London is the second most visited city in the world and the Mayor wants to spread economic and regeneration benefits by working with London & Partners to **promote tourism across the whole of the city**, including outside central London. This Plan supports the enhancement and extension of London's attractions particularly to town centres and well-connected parts of outer London, complemented by supporting infrastructure including visitor accommodation, a high-quality public realm, public toilets and measures to promote access by walking, cycling and public transport.

6.10.2 Given the importance of tourism to London's economy, London needs to ensure that it is able to **meet the accommodation demands of tourists** who want to visit the capital. It is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average

of 2,230 bedrooms per annum.[125] In addition to leisure visitors the needs of business visitors require consideration, including provision of suitable facilities for meetings, conferences and exhibitions in both hotels and purpose-built convention and exhibition centres.

6.10.3 **Boroughs in the CAZ** are encouraged to direct strategically-significant serviced accommodation (defined as more than 20,000 sq.m. in the CAZ) towards the CAZ Opportunity Areas. Concentrations of serviced accommodation within parts of the CAZ that might constrain other important strategic activities and land uses (for example offices and other commercial, cultural and leisure uses) or erode the mixed-use character of an area should be avoided. **Boroughs in outer and inner London beyond the CAZ** are encouraged to plan proactively for new serviced accommodation in town centres to help spread the benefits of tourism to the whole of the capital.

6.10.4 Improving the availability of **accessible serviced accommodation**[126] is vital to ensuring that as many visitors as possible can stay in London and experience its visitor attractions and business offer. To help achieve this, serviced accommodation developments should achieve the highest standards of accessible and inclusive design (see also Policy D5 Inclusive design). The policy requirement provides two options and developers can choose the option which best fits the scale of development proposed. These requirements aim to recognise the need not only for standard wheelchair accessible rooms, but also rooms suitable for people with ambulant mobility impairments or older people who could benefit from additional access features, as well as rooms suitable for people who require assistance or need to be near to a carer.

125 Working Paper 88, Projections of demand and supply for visitor accommodation in London to 2050, GLA Economics, 2017, https://www.london.gov.uk/sites/default/files/visitor_accommodation_-_working_paper_88.pdf

126 Working Paper 90, Projections of demand and supply for accessible hotel bedrooms in London, GLA Economics, 2017, https://www.london.gov.uk/sites/default/files/accessible-hotel-rooms-wp90.pdf

Policy E11 Skills and opportunities for all

A The Mayor will work with strategic partners to address low pay and gender and ethnicity pay gaps, and, as set out in his Skills for Londoners Strategy, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.

B Development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that:

1) enable those people undertaking training to complete their training and apprenticeships
2) ensure the greatest possible level of take-up by Londoners of the training, apprenticeship and employment opportunities created
3) increase the proportion of under-represented groups within the construction industry workforce.

In partnership with the Mayor, boroughs are encouraged to consider cross-borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.

6.11.1 London has a strong, dynamic, global economy, but despite the capital's economic growth and prosperity, the employment rate has lagged behind the national average for three decades. More than 270,000 Londoners are unemployed, with particularly high rates of youth unemployment. Employment rates in London are consistently lower for those without any formal qualifications. London also has a growing problem of in-work poverty, associated with low-skilled low-paid work. Ensuring an **effective and responsive skills system** is critical to tackling these issues, enabling more Londoners to find and progress in work and support strategic and local regeneration.

6.11.2 Developers are often required to make **employment and training opportunities in new developments** available to local residents as part of Section 106 planning agreements. While there are examples of this approach working well, by ensuring that developers make a direct, positive contribution to the local communities in which they are working, the current model does not always

succeed in enabling residents to complete their training, securing sustainable employment for local people or meeting the demand for construction skills.

6.11.3 **Employment and training targets** included in Section 106 agreements are often based on the number of new apprenticeship or training starts, rather than the meaningful completion of these. The often short-term nature of construction projects compared to the longer duration of apprenticeships mean that apprentices employed at the beginning of a project may not have finished their training by the time construction on site is completed. This means that once developments finish, apprentices may not be able to move with contractors to developments in different areas (because they too will have their own local labour requirements and requirements for new training and employment starts). They may therefore, be unable to complete their training. In addition, local labour requirements can mean that contractors struggle to meet the demand for skills because they must source labour from a geographically-defined labour pool, where the required skills may not necessarily be available.

6.11.4 **Cross-borough working, co-ordination and sharing of data** on employment and training opportunities, together with a more uniform approach to the drafting of Section 106 obligations across the capital, could help deliver more successful employment outcomes and ensure that the objectives in Part B can be achieved. The GLA is keen to support this approach and, as recommended by the Mayor's Homes for Londoners Construction Skills Sub-Group, will investigate how best to do this, recognising that there is a need to demonstrate that any new approach improves outcomes for employers, boroughs and residents. This new approach should provide more meaningful employment and training opportunities for residents across London, while recognising the importance of new developments for providing local employment opportunities. Successful implementation of this approach should ensure that employment and apprenticeship opportunities created by developments are taken up and completed by a greater number of Londoners.

Chapter 7

Heritage and Culture

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Policy HC1 Heritage conservation and growth

A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

1) setting out a clear vision that recognises and embeds the role of heritage in place-making
2) utilising the heritage significance of a site or area in the planning and design process
3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of

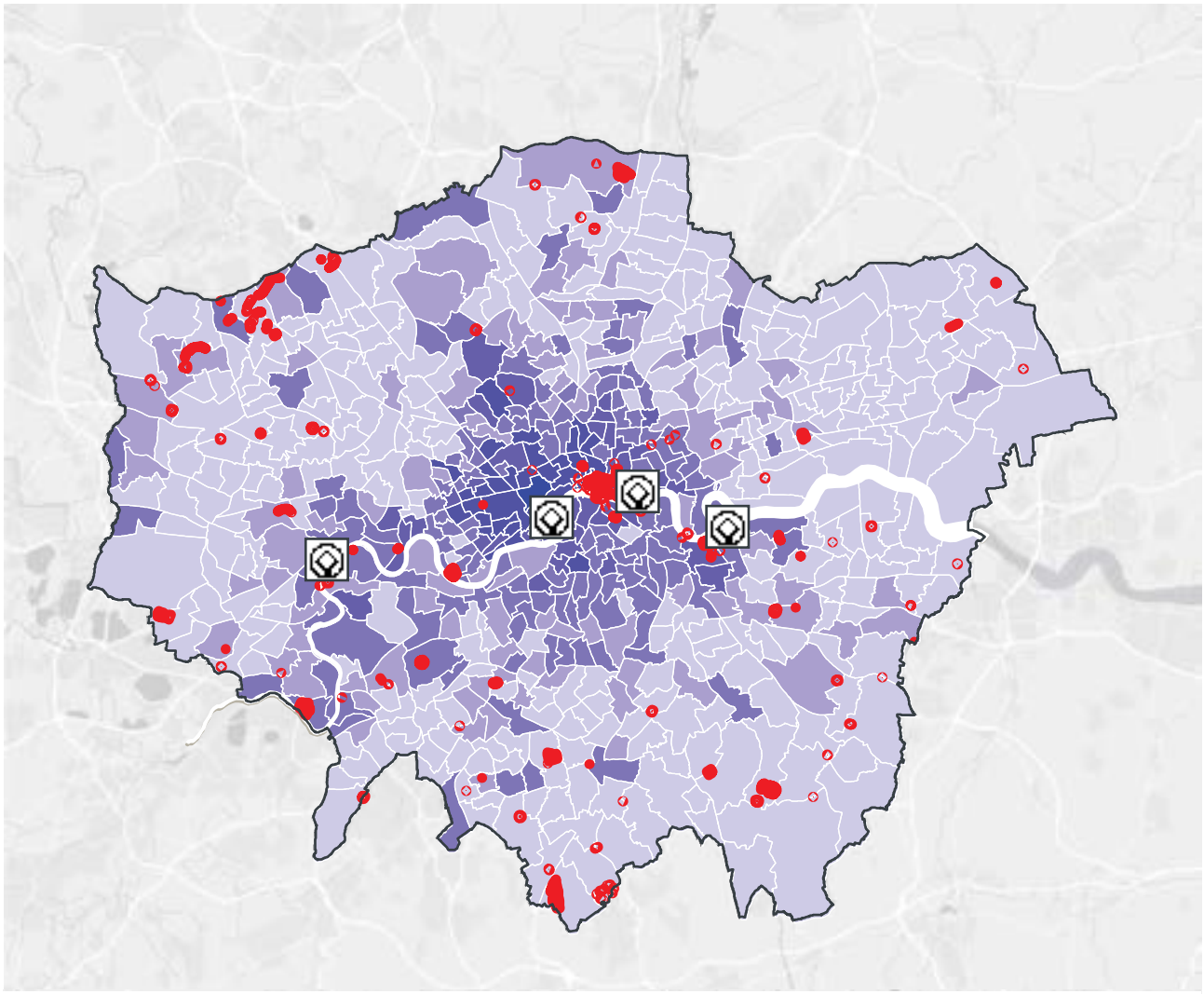
archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

7.1.1 London's historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city's economy, culture and quality of life. The built environment, combined with its historic landscapes, provides a unique sense of place, whilst layers of architectural history provide an environment that is of **local, national and international value**. London's heritage assets and historic environment are irreplaceable and an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth. The Mayor will develop a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth.

7.1.2 London's **diverse range of designated and non-designated heritage assets** contributes to its status as a world-class city. Designated assets currently include four World Heritage Sites, over 1,000 conservation areas, 19,000 list entries for historic buildings, 150 registered parks and gardens, 160 scheduled monuments, and one battlefield. Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows, ancient woodlands, and ancient and veteran trees. The distribution of designated assets differs across different parts of London, and is shown in Figure 7.1, Figure 7.2, Figure 7.3, and Figure 7.4. Note that these maps are for illustrative purposes only.

Figure 7.1 - Listed Buildings, Scheduled Monuments and World Heritage Sites



Listed Buildings
per square km

- 350 - 710
- 100 - 349
- 50 - 99
- 10 - 49
- 5 - 9
- 0 - 4

Scheduled Monuments

UNESCO World Heritage Sites from left to right: Royal Botanical Gardens, Kew; Westminster; Tower of London; and Maritime Greenwich

Source: Historic England

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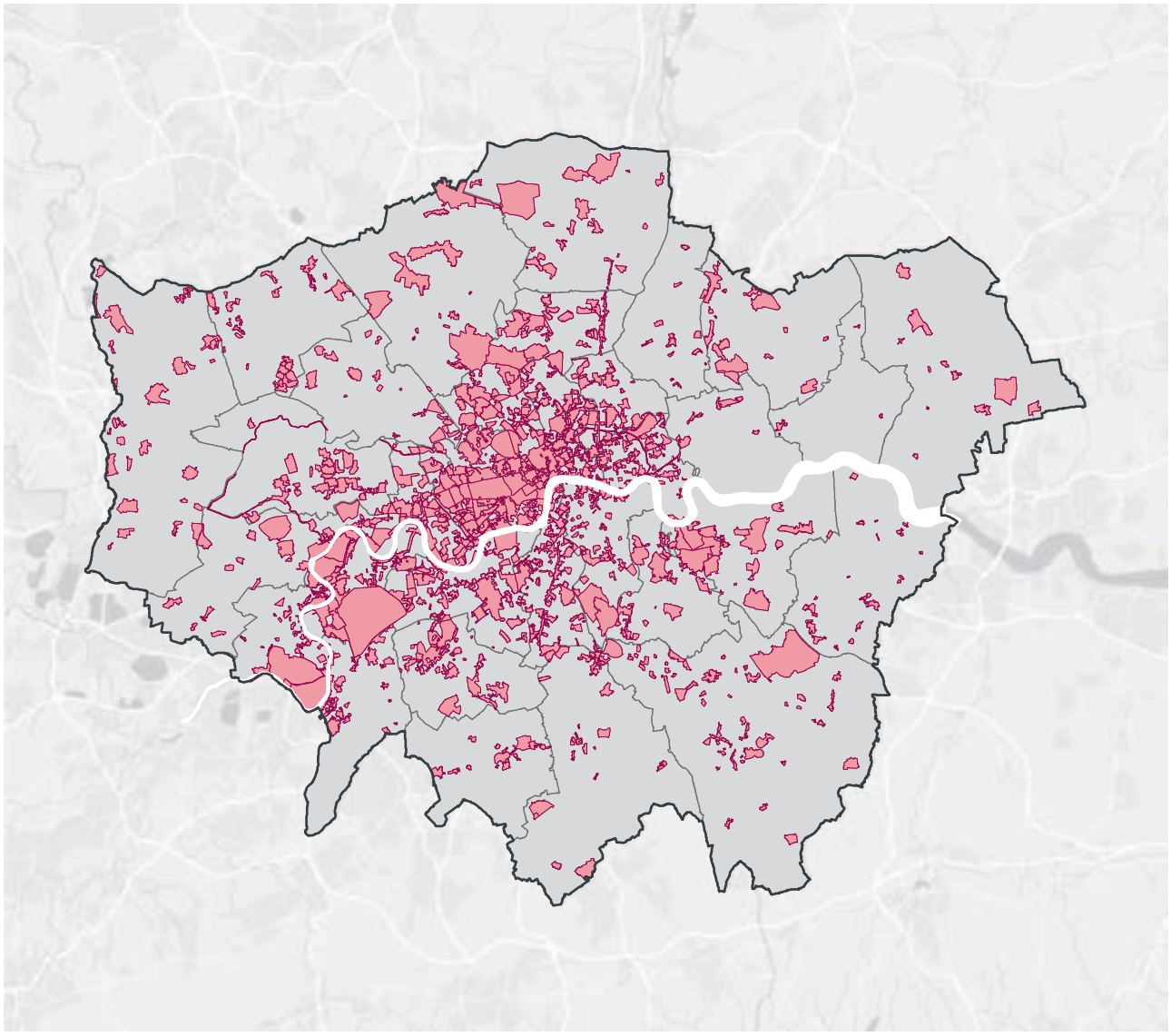
Figure 7.2 - London's Conservation Areas



London's Conservation Areas

Conservation Areas
London boroughs designate and review

Source: Historic England

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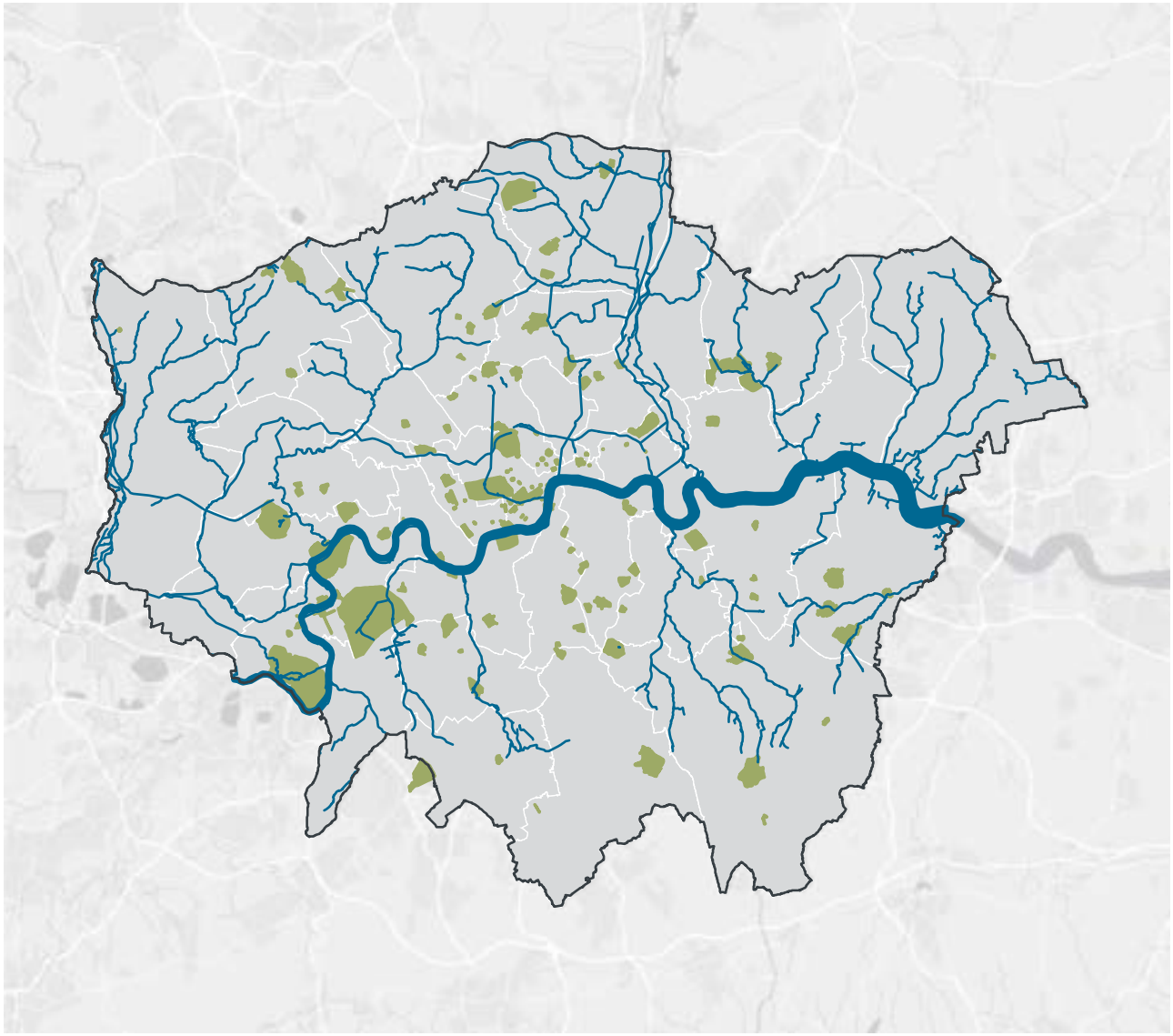
Figure 7.3 - London's Waterways and Registered Historic Parks & Gardens



London's Waterways and Registered Parks and Gardens

- Registered Historic Parks and Gardens
- Waterways

This map shows the spatial distribution of London's Registered Historic Parks and Gardens, which are designated heritage assets. It also shows the extensive network of London's waterways, many of which will have historic significance.

Source: Historic England

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7.1.3 Ensuring the **identification and sensitive management of London's heritage assets**, in tandem with promotion of the highest standards of architecture, will be essential to maintaining the blend of old and new that contributes to the capital's unique character. London's heritage reflects the city's diversity, its people and their impact on its structure. When assessing the significance of heritage assets, it is important to appreciate the influence of past human cultural activity from all sections of London's diverse community. Every opportunity to bring the story of London to people and improve the accessibility and maintenance of London's heritage should be exploited. Supporting infrastructure and visitor facilities may be required to improve access and enhance appreciation of London's heritage assets.

7.1.4 Many heritage assets make a significant contribution to local character which should be sustained and enhanced. The Greater London Historic Environment Record (GLHER)[127] is a comprehensive and dynamic resource for the historic environment of London containing over 196,000 entries. In addition to utilising this record, boroughs' existing **evidence bases**, including character appraisals, conservation plans and local lists should be used as a reference point for plan-making and when informing development proposals.

7.1.5 As set out in Policy D1 London's form, character and capacity for growth, Development Plans and strategies should demonstrate a clear understanding of the heritage values of a building, site or area and its relationship with its surroundings. Through proactive management from the start of the development process, planners and developers should **engage and collaborate with stakeholders** so that the capital's heritage contributes positively to its future. To ensure a full and detailed understanding of the local historic environment, stakeholders should include Historic England, London's Parks and Gardens Trust, The Royal Parks, boroughs, heritage specialists, local communities and amenity societies.

7.1.6 Historically, London has demonstrated an ability to regenerate itself, which has added to the city's distinctiveness and diversity of inter-connected places. Today **urban renewal** in London offers opportunities for the creative re-use of heritage assets and the historic environment as well as the enhancement,

127 The GLHER is a public record managed by Historic England and can be accessed by visiting the GLHER office and through remote searches that involve the supply of digital GLHER data. More information can be found at: https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/

repair and beneficial re-use of heritage assets that are on the At Risk Register.[128] In some areas, this might be achieved by reflecting existing or original street patterns and blocks, or revealing and displaying archaeological remains; in others, it will be expressed by retaining and reusing buildings, spaces and features that play an important role in the local character of an area. Policy D1 London's form, character and capacity for growth further addresses the issue of understanding character and context.

7.1.7 **Heritage significance** is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may be represented in many ways, in an asset's visual attributes, such as form, materials, architectural detail, design and setting, as well as through historic associations between people and a place, and where relevant, the historic relationships between heritage assets. Development that affects heritage assets and their settings should respond positively to the assets' significance, local context and character to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form.

7.1.8 Where there is evidence of **deliberate neglect** of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset will be disregarded when making a decision on a development proposal.

7.1.9 Understanding of **London's archaeology** is continuously developing with much of it yet to be fully identified and interpreted. To help identify sites of archaeological interest, boroughs are expected to develop up-to-date Archaeological Priority Areas for plan-making and decision-taking. Up-to-date Archaeological Priority Areas (APAs) are classified using a tier system recognising their different degrees of archaeological significance and potential as presently understood. Tier 1 APAs help to identify where undesignated archaeological assets of equivalent significance to a scheduled monument – and which are subject to the same policies as designated assets – are known or likely to be present.

7.1.10 Across London, Local Plans identify areas that have known archaeological interest or potential. The whole of the City of London has high archaeological sensitivity whilst elsewhere the Greater London **Archaeological Priority Area**

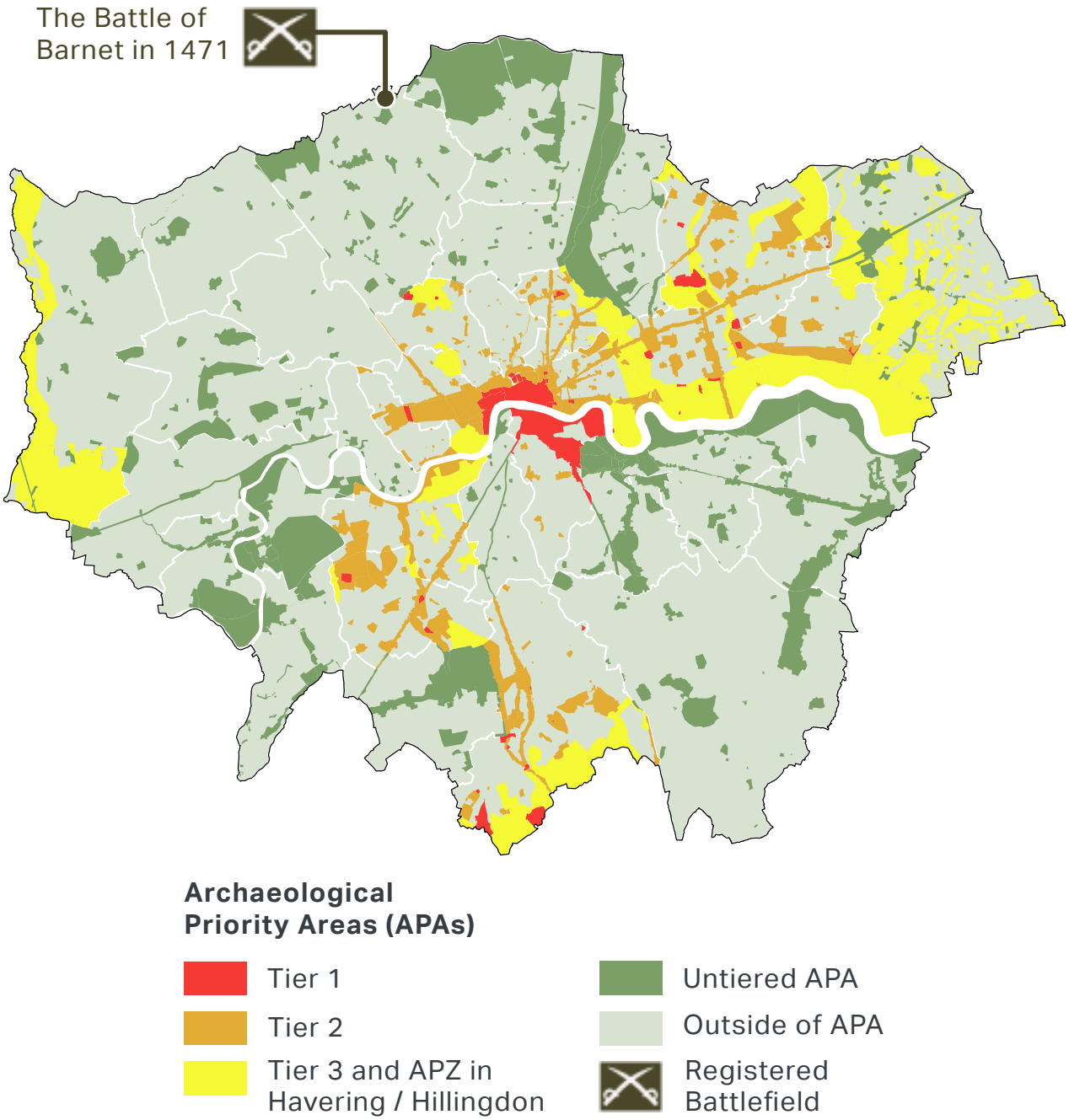
128 The Heritage at Risk Register is produced annually as part of Historic England's Heritage at Risk programme. The Register includes buildings or structures, places of worship, archaeological sites, battlefields, wrecks, parks and gardens, and conservation area known to be at risk as a result of neglect, decay or inappropriate development. Further information can be found at: https://historicengland.org.uk/advice/heritage-at-risk/

Review Programme is updating these areas using new consistent London-wide criteria (see Figure 7.4). Each new APA is assigned to a tier:

- Tier 1 is a defined area which is known, or strongly suspected, to contain a heritage asset of national significance, or which is otherwise of very high archaeological sensitivity.
- Tier 2 is a local area with specific evidence indicating the presence, or likely presence, of heritage assets of archaeological interest.
- Tier 3 is a landscape-scale zone within which there is evidence indicating the potential for heritage assets of archaeological interest to be discovered.
- Tier 4 (outside APA) covers any location that does not, on present evidence, merit inclusion within an Archaeological Priority Area.
- Other APAs which have not yet been reviewed are not assigned to a tier.

7.1.11 Developments will be expected to **avoid or minimise harm to significant archaeological assets**. In some cases, remains can be incorporated into and/or interpreted in new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably-qualified individuals or organisations.

Figure 7.4 - Archaeological Priority Areas and Registered Battlefield



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Policy HC2 World Heritage Sites

A Boroughs with World Heritage Sites, and those that are neighbours to authorities with World Heritage Sites, should include policies in their Development Plans that conserve, promote, actively protect and interpret the Outstanding Universal Value of World Heritage Sites, which includes the authenticity and integrity of their attributes and their management.

B Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.

C Development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment.

D Up-to-date World Heritage Site Management Plans should be used to inform the plan-making process, and when considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plan.

7.2.1 The UNESCO World Heritage Sites at Maritime Greenwich, Royal Botanic Gardens Kew, Palace of Westminster and Westminster Abbey including St Margaret's Church, and the Tower of London are among the most important cultural heritage sites in the world and are a key feature of London's identity as a world city. In ratifying the World Heritage Convention, the UK Government has made a commitment to **protecting, conserving, presenting and transmitting to future generations the Outstanding Universal Value of World Heritage Sites** and to protecting and conserving their settings. Much of this commitment is discharged by local authorities, including the GLA, through their effective implementation of national, regional, and local planning policies for conserving and enhancing the historic environment.

7.2.2 The context of each of the four London World Heritage Sites is markedly different and the qualities of each is conditioned by the character and form of its surroundings as well as other cultural, intellectual, spatial or functional

relationships. The **surrounding built environment** must be carefully managed to ensure that the attributes of the World Heritage Sites that make them of Outstanding Universal Value are protected and enhanced, while allowing the surrounding area to change and evolve as it has for centuries.

7.2.3 The **setting of London's World Heritage Sites** consists of the surroundings in which they are experienced, and is recognised as fundamentally contributing to the appreciation of a World Heritage Site's Outstanding Universal Value. As all four of London's World Heritage Sites are located along the River Thames, the setting of these sites includes the adjacent riverscape as well as the surrounding landscape. Changes to the setting can have an adverse, neutral or beneficial impact on the ability to appreciate the sites' Outstanding Universal Value. The consideration of **views** is part of understanding potential impacts on the setting of the World Heritage Sites. Many views to and from World Heritage Sites are covered, in part, by the London Views Management Framework (see Policy HC3 Strategic and Local Views and Policy HC4 London View Management Framework). However, consideration of the attributes that contribute to their Outstanding Universal Value is likely to require other additional views to be considered. These should be set out in World Heritage Site Management Plans (see below), and supported wherever possible by the use of accurate 3D digital modelling and other best practice techniques.

7.2.4 **Policies protecting the Outstanding Universal Value of World Heritage Sites** (WHS) should be included in the Local Plans of those boroughs where visual impacts from developments could occur. It is expected that boroughs' plans (including but not limited to the following) should contain such policies: City of London (Tower of London WHS); Royal Borough of Greenwich (Maritime Greenwich WHS); Hounslow (Royal Botanical Gardens Kew WHS); Lambeth (Westminster WHS); Lewisham (Maritime Greenwich WHS); Richmond (Royal Botanical Gardens Kew WHS); Southwark (Tower of London WHS, Westminster WHS); Tower Hamlets (Tower of London WHS, Maritime Greenwich WHS); Wandsworth (Westminster WHS); City of Westminster (Westminster WHS). Supplementary Planning Guidance will provide further guidance on settings and buffer zones.

7.2.5 Boroughs should ensure that their Local Plan policies support the management of World Heritage Sites, details of which can be found in **World Heritage Site Management Plans.** For Outstanding Universal Value, Management Plans should set out:

- the attributes that convey the Outstanding Universal Value, and
- the management systems to protect and enhance the Outstanding Universal Value of the World Heritage Sites.

7.2.6 The Mayor will support steering groups in managing the World Heritage Sites and will actively engage with stakeholders in the development and implementation of World Heritage Management Plans. It is expected that the boroughs with World Heritage Sites, GLA, Historic England and neighbouring boroughs will be part of the **World Heritage Site Steering Groups** that contribute to the management of the sites, including the drafting and adoption of Management Plans.

Policy HC3 Strategic and Local Views

A Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. The Mayor has designated a list of Strategic Views (Table 7.1) that he will keep under review. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.

B Within the designated views, the Mayor will identify landmarks that make aesthetic, historic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view.

C The Mayor will also identify Strategically-Important Landmarks in the views that make a very significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the Strategically-Important Landmark. These and other views are also subject to wider assessment beyond the Protected Vista.

D The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity, and attributes of Outstanding Universal Value. This includes the identification of Protected Silhouettes of key features in a World Heritage Site.

E The Mayor has prepared Supplementary Planning Guidance on the management of the designated views – the London View Management

Framework Supplementary Planning Guidance (LVMF SPG). The Mayor will, when necessary, review this guidance.

F Boroughs should include all designated views, including the protected vistas, in their Local Plans and work with relevant land owners to ensure there is inclusive public access to the viewing location, and that the view foreground, middle ground and background are effectively managed in accordance with the LVMF SPG.

G Boroughs should clearly identify local views in their Local Plans and strategies. Boroughs are advised to use the principles of Policy HC4 London View Management Framework for the designation and management of local views. Where a local view crosses borough boundaries, the relevant boroughs should work collaboratively to designate and manage the view.

7.3.1 A number of views make a significant contribution to the image and character of London at the strategic level. This could be because of their composition, their contribution to the legibility of the city, or because they provide an opportunity to see key landmarks as part of a broader townscape, panorama or river prospect. The Mayor will seek to **protect the composition and character of these views**, particularly if they are subject to significant pressure from development. New development can make a positive contribution to the views and this should be encouraged, but where development is likely to compromise the setting or visibility of a key landmark it should be resisted. The views that the Mayor has designated are listed in Table 7.1, with Figure 7.5 showing the indicative viewing locations of these designated views.

7.3.2 There are three types of Strategic Views designated in the London Plan – **London Panoramas, River Prospects, and Townscape Views** (including Linear Views). Each view can be considered in three parts; the foreground, middle ground and background. The front and middle ground areas are the areas between the viewing place and/or the natural features that form its setting. The background area to a view extends away from the foreground or middle ground into the distance. Part of the background may include built or landscape elements that provide a backdrop to a Strategically-Important Landmark.

7.3.3 The Mayor identifies **three Strategically-Important Landmarks** in the designated views: St Paul's Cathedral, the Palace of Westminster and the Tower of London. Within some views, a Protected Vista to a Strategically-Important Landmark will be defined and used to protect the viewer's ability to recognise

and appreciate the Strategically-Important Landmark. The **Protected Vista** is composed of two parts:

- Landmark Viewing Corridor – the area between the viewing place and a Strategically-Important Landmark that must be maintained if the landmark is to remain visible from the viewing place.
- Wider Setting Consultation Area – the area enclosing the Landmark Viewing Corridor in the foreground, middle ground and background of the Protected Vista. Development above a threshold height in this area could compromise the viewer's ability to recognise and appreciate the Strategically-Important Landmark.

7.3.4 The London View Management Framework Supplementary Planning Guidance (LVMF SPG) provides further guidance on the **management of views** designated in this Plan. This includes plans for the management of views as seen from specific assessment points within the viewing places. The SPG provides advice on the management of the foreground, middle ground and background of each view. This guidance identifies viewing places within which viewing locations can be identified. It also specifies individual assessment points from which management guidance and assessment should be derived. Some views are experienced as a person moves through a viewing area and assessment of development proposals should consider this. The SPG provides guidance on the treatment of all parts of the view, and where appropriate the components of the Protected Vista for each view.

Table 7.1 - Designated Strategic Views

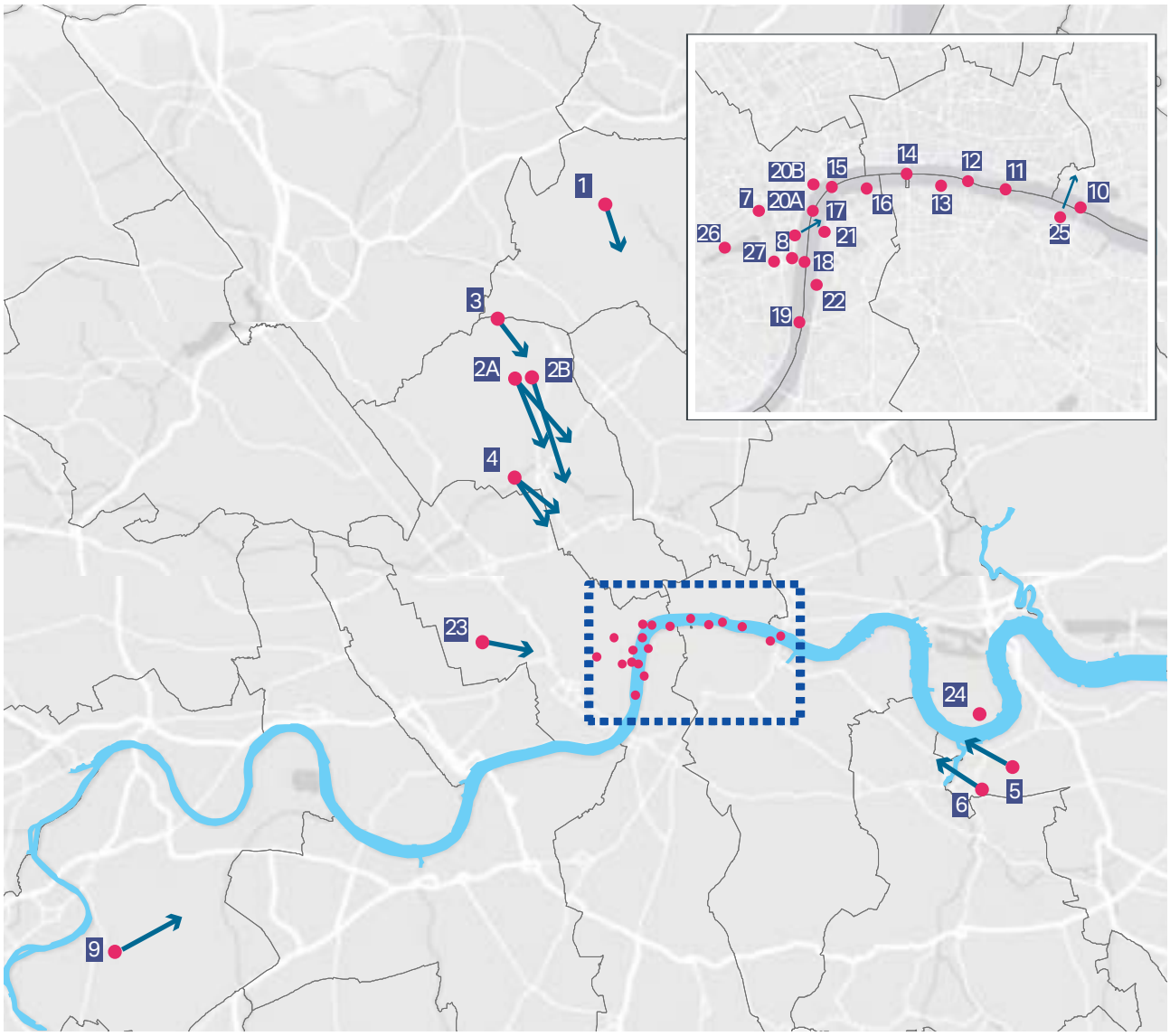
Reference	View
London Panoramas	
1	Alexandra Palace to Central London
2	Parliament Hill to Central London
3	Kenwood to Central London
4	Primrose Hill to Central London
5	Greenwich Park to Central London
6	Blackheath Point to Central London
Linear Views	
7	The Mall to Buckingham Palace
8	Westminster Pier to St Paul's Cathedral
9	King Henry VIII's Mound, Richmond to St Paul's Cathedral
River Prospects	
10	Tower Bridge
11	London Bridge
12	Southwark Bridge
13	Millennium Bridge and Thames side at Tate Modern
14	Blackfriars Bridge
15	Waterloo Bridge
16	The South Bank
17	Golden Jubilee/Hungerford Footbridges
18	Westminster Bridge
19	Lambeth Bridge
20	Victoria Embankment between Waterloo and Westminster Bridges
21	Jubilee Gardens and Thames side in front of County Hall

Reference	View
22	Albert Embankment between Westminster and Lambeth Bridges along Thames Path near St Thomas' Hospital
Townscape Views	
23	Bridge over the Serpentine, Hyde Park to Westminster
24	Island Gardens, Isle of Dogs to Royal Naval College
25	The Queen's Walk to Tower of London
26	St James' Park to Horse Guards Road
27	Parliament Square to Palace of Westminster

7.3.5 The Mayor will work with boroughs and landowners of the Protected Vista **viewing locations** to ensure the viewing points are clearly identified. Boroughs and landowners should manage the viewing locations to ensure they are accessible to the public and, where appropriate, mark the viewing location and provide information about landmarks that can be seen in the view. Vegetation in the foreground and middle ground of a view must be regularly maintained in accordance with the LVMF SPG management guidance to ensure the view is not obscured.

7.3.6 Clearly identifying **local views** in Local Plans and strategies enables the effective management of development in and around the views. This could take the form of geometrically defining the view requiring protection, in particular the assessment point and direction of the viewing location, through mapping or 3D modelling. Where local views are clearly identified they should be protected and managed in a similar manner as Strategic Views, following the principles of Policy HC4 London View Management Framework.

Figure 7.5 - Designated Strategic Views



London's Designated Strategic Views

Strategic Views

References refer to table 7.1

This map shows the indicative viewing locations of the designated strategic views, but not all the assessment points within the viewing places. The arrows indicate the direction of the view for the protected vistas. Please refer to the LVMF SPG for full details of the assessment points.

Source: GLA Planning

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Policy HC4 London View Management Framework

A Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.

B Development in the foreground, middle ground and background of a designated view should not be intrusive, unsightly or prominent to the detriment of the view.

C Development proposals and external illumination of structures in the background of a view should give context to landmarks and not harm the composition of the view as a whole. Where a silhouette of a World Heritage Site is identified by the Mayor as prominent in a designated view, and well-preserved within its setting with clear sky behind, it should not be altered by new development appearing in its background. Assessment of the impact of development in the foreground, middle ground or background of the view or the setting of a Strategically-Important Landmark should take into account the effects of distance and atmospheric or seasonal changes.

D Development proposals in designated views should comply with the following:

1) London Panoramas should be managed so that development fits within the prevailing pattern of buildings and spaces, and should not detract from the panorama as a whole. The management of views containing Strategically-Important Landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the Strategically-Important Landmark in the foreground, middle ground or background where appropriate

2) River Prospects should be managed to ensure that the juxtaposition between elements, including the river frontages and key landmarks, can be appreciated within their wider London context

3) Townscape and Linear Views should be managed so that the ability to see specific buildings, or groups of buildings, in conjunction with the surrounding environment, including distant buildings within views, is preserved.

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E Viewing places should be accessible and managed so that they enhance people's experience of the view.

F Where there is a Protected Vista:

1) development that exceeds the threshold height of a Landmark Viewing Corridor should be refused
2) development in the Wider Setting Consultation Area should form an attractive element in its own right and preserve or enhance the viewer's ability to recognise and to appreciate the Strategically-Important Landmark. It should not cause a canyon effect around the Landmark Viewing Corridor
3) development in the background should not harm the composition of the Protected Vistas, nor the viewer's ability to recognise and appreciate the Strategically-Important Landmark, whether the development proposal falls inside the Wider Setting Consultation area or not
4) development in the foreground of the wider setting consultation area should not detract from the prominence of the Strategically-Important Landmark in this part of the view.

7.4.1 **Protected Vistas** are designed to preserve the viewer's ability to recognise and appreciate a Strategically-Important Landmark from a designated viewing place. Development that exceeds the threshold plane of the Landmark Viewing Corridor will have a negative impact on the viewer's ability to see the Strategically-Important Landmark and is therefore contrary to the London Plan. Development in the foreground, middle ground or background of a view can exceed the threshold plane of a Wider Setting Consultation Area if it does not damage the viewer's ability to recognise and to appreciate the Strategically-Important Landmark and if it does not dominate the Strategically-Important Landmark in the foreground or middle ground of the view. Development in the background of a Protected Vista that is inside or outside of the Wider Setting Consultation area should not harm the composition of the Protected Vistas.

7.4.2 Development should make a positive contribution and where possible **enhance the viewer's ability to recognise Strategically-Important Landmarks**. Where existing buildings currently detract from or block the view, this should not be used as justification for new development to likewise exceed the threshold height of the Landmark Viewing Corridor.

7.4.3 Opportunities to **reinstate Landmark Viewing Corridors** arising as a result of redevelopment and demolition of existing buildings that exceed Landmark Viewing Corridor threshold height should be taken whenever possible.

Policy HC5 Supporting London's culture and creative industries

A The continued growth and evolution of London's diverse cultural facilities and creative industries is supported. Development Plans and development proposals should:

1) protect existing cultural venues, facilities and uses where appropriate and support the development of new cultural venues in town centres and places with good public transport connectivity. To support this, boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, evaluate what is unique or important to residents, workers and visitors and develop policies to protect those cultural assets and community spaces
2) identify and promote new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal
3) identify, protect and enhance strategic clusters of cultural attractions
4) consider the use of vacant properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas
5) seek to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues and/or facilities and spaces for outdoor cultural events.

B Boroughs are encouraged to work with the Mayor and relevant stakeholders to identify Creative Enterprise Zones in Local Plans:

1) in areas that have emerging or existing clusters of creative industries; or
2) in areas of identified demand and more deprived areas where there is evidence that the designation of a Creative Enterprise Zone will enhance the local economy and provide facilities and workspace for the creative industries.

C Where a Creative Enterprise Zone has been identified, Local Plan policies should:

1) develop, enhance, protect and manage new and existing creative workspace, providing flexibility for changing business needs, and an attractive business environment including related ancillary facilities
2) support existing, and the development of new, cultural venues within the Creative Enterprise Zone
3) help deliver spaces that are suitable, attractive and affordable for the creative industries, taking into account the particular requirements of established and emerging creative businesses in the Creative Enterprise Zone in accordance with Policy E2 Providing suitable business space, Policy E4 Land for industry, logistics and services to support London's economic function and Policy E8 Sector growth opportunities and clusters
4) encourage the temporary use of vacant buildings (including heritage assets) and sites for creative workspace and activities
5) integrate public transport, digital and other infrastructure, and services such as leisure, recreation, education and community facilities in the establishment and development of the Creative Enterprise Zone
6) support a mix of uses which derive mutual benefits from, and do not compromise, the creative industries and cultural facilities in the Creative Enterprise Zone in line with the Agent of Change principle (see Policy D13 Agent of Change)
7) contribute to the achievement of wider objectives for the business location such as the economic vitality and diversity of a town centre or the intensification of an industrial area.

7.5.1 London's **rich cultural offer** includes visual and performing arts, music, spectator sports, festivals and carnivals, pop-ups and street markets, and a diverse and innovative food scene, which is important for London's cultural tourism. The vibrancy of London's culture is integrally linked to the diverse communities of the city, and grassroots venues and community projects are as important as London's famous cultural institutions in providing opportunities for all Londoners to experience and get involved in culture.

7.5.2 The capital's cultural offer is often informed, supported and influenced by the work of the creative industries such as advertising, architecture, design, fashion, publishing, television, video games, radio and film. Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, museums, theatres, cinemas, libraries, music, spectator sports, and other entertainment or performance venues, including pubs and night clubs. Although primarily serving other functions, the public realm, community facilities, places of worship, parks and skate-parks can provide important settings for a wide range of arts and cultural activities.

7.5.3 London's culture sector and the creative industries deliver both **economic and social benefits** for the capital. In 2015, the Gross Value Added (GVA) of the creative industries in London was estimated at £42 billion, accounting for just under half of the UK total from these industries, and contributing 11.1 per cent to London's total GVA. Cultural tourism supported 80,000 jobs and contributed £3.2 billion of GVA to London in 2013, just under a third of the overall contribution from the tourism sector as a whole. As well as being one of London's most dynamic sectors, culture also plays a role in building strong communities, increasing healthy life outcomes and generating civic pride.

7.5.4 Despite this positive general picture, London's competitive land market means that the industry is struggling to find sufficient venues to grow and thrive, and is **losing essential spaces and venues** for cultural production and consumption including pubs, night clubs, venues that host live or electronic music and rehearsal facilities. Creative businesses and artists also struggle to find workspace and secure long-term financing and business support as their activities are perceived to be 'risky' or of non-commercial value.

7.5.5 Boroughs are encouraged to develop an understanding of the existing cultural offer in their areas, **evaluate what is unique or important to residents, workers and visitors** and develop policies to protect those cultural assets and community spaces. Boroughs should draw on the Mayor's forthcoming Cultural Infrastructure Plan to assess and develop their cultural offer. Boroughs should also consider how the cultural offer serves different groups of people (such as young people, BAME groups and the LGBT+ community), and where the cultural offer is lacking for particular groups. Boroughs should put in place policies and strategies to ensure that cultural facilities catering for such groups and communities are protected, especially facilities that are used in the evening and night time.

7.5.6 The loss of cultural venues, facilities or spaces can have a detrimental effect on an area, particularly when they serve a local community function. Where

possible, boroughs should protect such cultural facilities and uses, and support alternative cultural uses, particularly those with an evening or night-time use, and consider nominations to designate them as **Assets of Community Value**. Where a development proposal leads to the loss of a venue or facility, boroughs should consider requiring the replacement of that facility or use.

7.5.7 Boroughs are encouraged to support opportunities to use vacant buildings and land for flexible and temporary **meanwhile uses or 'pop-ups'** especially for alternative cultural day and night-time uses. The use of temporary buildings and spaces for cultural and creative uses can help stimulate vibrancy, vitality and viability in town centres by creating social and economic value from vacant properties. Meanwhile uses can also help prevent blight in town centres and reduce the risk of arson, fly tipping and vandalism. The benefits of meanwhile use also include short-term affordable accommodation for SMEs and individuals, generating a short-term source of revenue for the local economy and providing new and interesting shops, cultural and other events and spaces, which can attract longer-term business investment. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.

7.5.8 Events and activities such as festivals, seasonal markets, exhibitions, performances, outdoor concerts and busking are not always dependent on using a dedicated cultural facility or venue and can make use of a range of **outdoor spaces** including streets, parks and other public areas. These types of activities, which are often free, offer a way for everyone to experience and participate in London's rich cultural life. The opportunity to incorporate these uses should be identified and facilitated through careful design and consideration of the impacts, for example on residents, visitors and biodiversity.

7.5.9 As well as protecting existing venues and facilities, boroughs should also work with a range of partners to develop and promote clusters of cultural activities and related uses and define them in their Local Plan. A successful **Cultural Quarter** should build on the existing cultural character of an area and encourage a mix of uses, including cafés, restaurants and bars alongside cultural assets and facilities, to attract visitors and generate interest. A Cultural Quarter can be used to form the basis for sustained cultural activity but may also include temporary activities and uses such as festivals, markets, exhibitions, performances and other cultural events.

7.5.10 Where appropriate, boroughs should use Cultural Quarters to seek **synergies between cultural provision, schools, and higher and further education** which can be used to nurture volunteering, new talent and audiences. This can include

partnerships with a range of cultural organisations, such as libraries, museums, galleries, music venues, dance studios, and theatres.

7.5.11 Boroughs should maximise opportunities for developing **Cultural Quarters in Opportunity Areas, other Areas for Regeneration and large-scale developments**. The inclusion of new cultural venues and facilities can assist with place-making, creating an attractive and vibrant area for residents, workers and visitors, as well as helping to form the character and distinctiveness of a new place.

7.5.12 London is internationally-renowned for its historic environment and cultural institutions, which are major visitor attractions as well as making an enormous contribution to the capital's culture and heritage. There are many areas in London which are rich in cultural heritage and have a unique cultural offer. These act as key visitor hubs for Londoners and domestic and international tourists and as such should be protected and promoted. They include: clusters of museums such as the South Kensington museums complex; the theatres, concert halls and galleries of the Southbank/Bankside/London Bridge area; the theatres and cinemas of the West End; Wembley Stadium and Wembley Arena; the Greenwich Riverside and O2 Centre; the Olympic Park; and London's Arcadia including Kew Gardens, parks, historic buildings and landscapes between Hampton Court and Kew along the River Thames. Boroughs should identify these and other **strategic clusters of cultural attractions** in their Local Plans.

7.5.13 Creative industries play an important role in London's economy and its cultural offer; and as a sector are growing at a faster rate than any other area of the economy. As part of his support for the creative industries, the Mayor is committed to working with boroughs and other relevant stakeholders to identify and set up **Creative Enterprise Zones** (CEZs). Setting up a CEZ can help boost the local economy of more deprived areas and support their regeneration. CEZs will support the provision of dedicated small industrial and creative workspaces and will seek to address issues of affordability and suitability of workspaces for artists and creative businesses.

7.5.14 CEZs should seek to p**rotect, develop and deliver new spaces the creative industries need** to produce, manufacture, design, rehearse and create cultural goods, as well as ancillary facilities where they can meet clients, network, share knowledge and showcase their work. Boroughs will be responsible for defining these areas in their Local Plans and developing policies to provide the workspace the industries need. This should include protecting existing workspace and encouraging new workspaces for the creative industries, ensuring that suitable business space and affordable workspace is made available in accordance with Policy E2 Providing suitable business space,

Policy E3 Affordable workspace and Policy E8 Sector growth opportunities and clusters, and encouraging the temporary use of vacant buildings for creative uses. In developing policies and strategies for CEZs, Boroughs should engage with local CEZ consortiums, communities and businesses.

Policy HC6 Supporting the night-time economy

A Boroughs should develop a vision for the night-time economy, supporting its growth and diversification, in particular within strategic areas of night-time activity (see Table A1.1 and Figure 7.6), building on the Mayor's Vision for London as a 24-Hour City.[129]

B In Development Plans, town centre strategies and planning decisions, boroughs should:

1) promote the night-time economy, where appropriate, particularly in the Central Activities Zone, strategic areas of night-time activity, and town centres where public transport such as the Night Tube and Night Buses are available
2) improve access, inclusion and safety, and make the public realm welcoming for all night-time economy users and workers
3) diversify the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafés, libraries, galleries and museums
4) address the cumulative impact of high concentrations of licensed premises on anti-social behaviour, noise pollution, health and wellbeing and other issues for residents and nearby uses, and seek ways to diversify and manage these areas
5) ensure night-time economy venues are well-served with safe and convenient night-time transport
6) protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues.

C Promoting management of the night-time economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services should

129 https://www.london.gov.uk/what-we-do/arts-and-culture/arts-and-culture-publications/londons-first-ever-24-hour-vision

be supported. Boroughs should work closely with stakeholders such as neighbouring boroughs, the police, local businesses, patrons, workers and residents.

7.6.1 The **night-time economy** refers to all economic activity taking place between the hours of 6pm and 6am, and includes evening uses. Night-time economic activities include eating, drinking, entertainment, shopping and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport and medical services, which employ a large number of night-time workers.

7.6.2 The night-time economy is becoming increasingly important to London's economy. The Mayor is keen to **promote London as a 24-hour global city,** taking advantage of London's competitive edge and attractiveness for businesses and people looking to expand beyond the usual daytime economy into night-time economic opportunities. However, 24-hour activities are not suitable for every part of London, and boroughs should balance the needs of local residents in all parts of London with the economic benefits of promoting a night-time economy.

7.6.3 London's night-time economy is generally focused in the Central Activities Zone (CAZ) and within town centres across the city. Different areas of night-time activity function at different scales and have different catchments. They have been classified, as set out in Table A1.1 and Figure 7.6, into three broad categories:

- NT1 – Areas of international or national significance
- NT2 – Areas of regional or sub-regional significance
- NT3 – Areas with more than local significance

7.6.4 Each night-time economy area will have its own character, which should be recognised and supported in order to maintain the **rich diversity of London's night-time economy**. Areas of international or national significance play a crucial role in putting London on the world stage, bringing internationally-renowned culture, performers and productions. Regional and sub-regional areas attract visitors from across and beyond London, and often have one or more larger venues and a mature night-time economy. These are generally in London's larger town centres. Areas with more than local significance draw visitors from other parts of London and tend to feature smaller venues and premises.

7.6.5 In addition, there are some town centres where the night-time economy serves the local area as well as other specific locations – such as London's wholesale

markets, major hospitals, and some industrial areas – where there is **significant economic or service activity at night**. This includes some retail and service industries, health services, policing and security, and transport and logistics. In exercising their various functions, boroughs should have regard to the strategic areas of night-time activity, as well as other night-time economic functions, and should set out strategies and policies that support the specific role of these areas in order to promote London's night-time economy.

7.6.6 There are many benefits to promoting night-time economic activity such as generating jobs, improving income from leisure and tourism, providing opportunities for social interaction, and making town centres safer by increasing activity and passive surveillance. Managing issues such as transport, servicing, increased noise, crime, anti-social behaviour, perceptions of safety, the quality of the street environment, and the potential negative effects on the health and wellbeing of Londoners, will require specific approaches tailored to the night-time environment, activities and related behaviour. Boroughs are encouraged to consider appropriate **management strategies and mitigation measures** to reduce negative impacts on the quality of life of local residents, workers and night-time economy customers, particularly in areas with high concentrations of licensed premises. Boroughs should also take account of local circumstances when considering whether to concentrate or disperse evening and night-time activities in town centres or within the CAZ. Boroughs should consider applying for accreditation with schemes such as Purple Flag[130] which provide a standard of excellence in managing the night-time economy.

7.6.7 Large concentrations of night-time activities can result in some places lacking activity and vitality during the day. Boroughs should consider opportunities to encourage the daytime uses of buildings that are mainly used for night-time activities to help **diversify the 24-hour offer**. Similarly, boroughs should explore the benefits of expanding the range of night-time economy activities to include extending opening hours and alternative evening and night-time uses of existing daytime facilities such as shops, cafés, restaurants, markets, community centres, libraries, theatres and museums. The temporary use of spaces and venues in the evening and at night can enhance the vibrancy and vitality of the night-time economy, particularly meanwhile uses of vacant premises, for example as arts venues, nightclubs, bars or restaurants.

7.6.8 The recently introduced Night Tube that operates on many Tube lines throughout the weekend, and the extensive network of night buses, has helped to create a public transport system that can support a 24-hour city including making travel easier for London's many night workers. Boroughs are encouraged

130 https://www.atcm.org/purple-flag

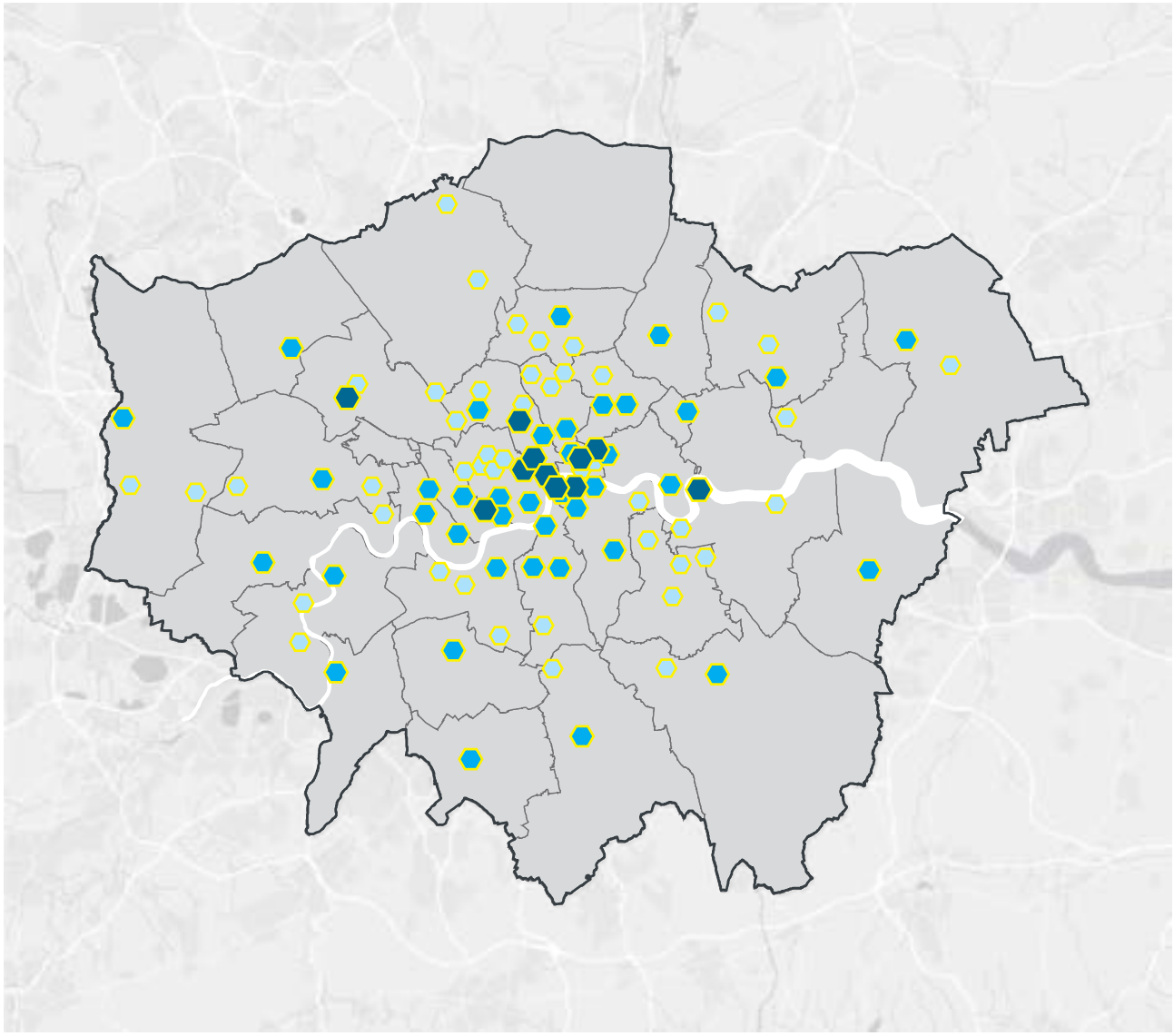
to work with Transport for London (TfL) to take advantage of **improved night-time public transport** to identify areas where night-time economic activity can be promoted and enhanced in a safe and attractive way. This would include considering planning applications for night-time venues and activities to diversify and enhance the night-time offer in town centres, particularly those that are within or well-connected to Areas for Regeneration (see Policy SD10 Strategic and local regeneration). Outer London boroughs, in particular, should consider the opportunities offered by an extended Night Tube and Night Bus network to increase the night-time offer in town centres for local residents, workers and visitors.

7.6.9 Boroughs should explore the benefits of **diversifying the night-time mix of uses**, particularly in areas where there are high concentrations of licensed premises, along with extended opening times of public places and spaces. This can help attract a more diverse range of visitors, including those who feel excluded from alcohol-based entertainment activities. It can also help decrease crime, anti-social behaviour and the fear of crime.

7.6.10 The night-time economy doesn't only happen inside; many night-time activities make use of **outside spaces including the public realm**, and enjoying the public spaces of the city at night is an important part of the night-time experience. This requires careful and co-ordinated management between a wide variety of stakeholders, including residents, to ensure that the city can be enjoyed at night to its fullest, and that the night-time economy complements rather than conflicts with daytime activities. Impacts such as noise and light pollution on local wildlife and biodiversity should be considered through appropriate location, design and scheduling, to address the requirements of Policy G6 Biodiversity and access to nature.

7.6.11 **Making London's night-time culture more enjoyable and inclusive** requires ensuring a wide range of evening and night-time activities are on offer to London's diverse population. In recent years, many valued night-time venues have been lost, and this has disproportionately affected particular groups. There are also groups of people who avoid town centres and night-time activities for a variety of reasons, for example physical barriers and lack of facilities for disabled people and older people, perceptions around safety and security particularly for women, those who feel excluded for socio-economic reasons and issues of staff attitudes towards, and awareness of, LGBT+ and BAME groups. Boroughs should work with land owners, investors and businesses to address perceived barriers to accessing the night-time economy and enhance the experience of London at night. This can include requiring new developments to provide accessible and gender-neutral toilets (see Policy S6 Public toilets), supporting venues

Figure 7.6 - Town centres and night-time economy roles – distinguishing those of international, sub-regional and more than local importance



Town Centre Network
Night Time Economy

- NT1 International/National
- NT2 Regional/Sub-regional
- NT3 More than local

Source: GLA Planning

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that serve specific groups (for example through the LGBT+ Venues Charter),[131] working with local police and businesses to make streets and the public realm safer and more welcoming, ensuring cleansing services are procured to clean up litter and sanitise streets and public areas, and working with local businesses, local communities, TfL and logistics operators to optimise servicing that occurs at night or supports the night-time economy.

Policy HC7 Protecting public houses

A In Development Plan Documents, town centre strategies, and planning decisions, boroughs should:

1) protect public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for town centres, night-time economy areas, Cultural Quarters and Creative Enterprise Zones

2) support proposals for new public houses where they would stimulate town centres, Cultural Quarters, the night-time economy and mixed-use development, taking into account potential negative impacts.

B Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.

C Development proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the public house that would compromise the operation or viability of the public house use should be resisted.

7.7.1 **Pubs are a unique and intrinsic part of British culture**. Many pubs are steeped in history and are part of London's built, social and cultural heritage. Whether alone, or as part of a cultural mix of activities or venues, pubs are often an integral part of an area's day, evening and night-time culture and economy. An individual pub can also be at the heart of a community's social life, often providing a local meeting place, a venue for entertainment or a focus for social

131 https://www.london.gov.uk/what-we-do/arts-and-culture/how-were-protecting-lgbt-nightlife-venues

gatherings. More recently, some pubs have started providing library services and parcel collection points as well as food to increase their offer and appeal to a wider clientele.

7.7.2 Through their unique and varied roles, pubs can contribute to the regeneration of town centres, Cultural Quarters and local tourism, as well as providing a focus for existing and new communities, and meeting the needs of particular groups, such as the LGBT+ and BAME communities. However, **pubs are under threat from closure** and redevelopment pressures, with nearly 1,200 pubs in London lost in 15 years.[132] The recent changes to the Town and Country Planning Act (General Permitted Development Order) (England) (2015) have, however, removed permitted development rights that previously allowed pubs and bars to change planning Use Class to shops, financial and professional services, restaurants and cafés without prior planning approval. This change in legislation offers greater protection for pubs and also incorporates a permitted development right that allows pub owners to introduce a new mixed use (A3/A4) which should provide flexibility to enhance a food offer beyond what was previously allowed as ancillary to the main pub use.

7.7.3 Many pubs are popular because they have intrinsic character. This is often derived from their architecture, interior and exterior fittings, their long-standing use as a public house, their history, especially as a place of socialising and entertainment catering for particular groups, their ties to local sports and other societies, or simply their role as a meeting place for the local community. In developing strategies and policies to enhance and retain pubs, boroughs should consider the **individual character of pubs** in their area and the broad range of characteristics, functions and activities that give pubs their particular value, including opportunities for flexible working.

7.7.4 **New pubs**, especially as part of a redevelopment or regeneration scheme, can provide a cultural and social focus for a neighbourhood, particularly where they offer a diverse range of services, community functions and job opportunities. However, it is important when considering proposals for new pubs that boroughs take account of issues such as cumulative impact zones, the Agent of Change principle (see Policy D13 Agent of Change) and any potential negative impacts. Boroughs should consider the replacement of existing pubs in redevelopment and regeneration schemes, where the loss of an existing pub is considered acceptable.

7.7.5 Boroughs should take a positive approach to designating pubs as an **Asset of Community Value** (ACV) when nominated by a community group. Listing a pub

132 Closing time: London's public houses, GLA Economics, April 2017

as an ACV gives voluntary groups and organisations the opportunity to bid for it if it is put up for sale. The 'right to bid' is not a right to buy and although owners of the asset have to consider bids from community groups, they do not have to accept them. An ACV listing does, nevertheless, give communities an increased chance to save a valued pub or other local facility. Boroughs should consider the listing of a pub as an ACV as a material consideration when assessing applications for a change of use and consider compulsory purchase orders where appropriate.

7.7.6 When **assessing whether a pub has heritage, cultural, economic or social value**, boroughs should take into consideration a broad range of characteristics, including whether the pub:

a. is in a Conservation Area
b. is a locally- or statutorily-listed building
c. has a licence for entertainment, events, film, performances, music or sport
d. operates or is closely associated with a sports club or team
e. has rooms or areas for hire
f. is making a positive contribution to the night-time economy
g. is making a positive contribution to the local community
h. is catering for one or more specific group or community.

7.7.7 To demonstrate authoritative **marketing evidence** that there is no realistic prospect of a building being used as a pub in the foreseeable future, boroughs should require proof that all reasonable measures have been taken to market the pub to other potential operators. The pub should have been marketed as a pub for at least 24 months at an agreed price following an independent valuation, and in a condition that allows the property to continue functioning as a pub. The business should have been offered for sale locally and London-wide in appropriate publications and through relevant specialised agents.

7.7.8 Many pubs built on more than one floor include ancillary uses such as function rooms and staff accommodation. Potential profit from development makes the conversion of upper pub floors to residential use extremely attractive to owners. Beer gardens and other outside space are also at risk of loss to residential development. The **change to residential use** of these areas can limit the operational flexibility of the pub, make it less attractive to customers, and prevent ancillary spaces being used by the local community. It can also threaten the viability of a pub through increased complaints about noise and other issues from new residents. Boroughs should resist proposals for redevelopment of associated accommodation, facilities or development within the curtilage of the

public house that would compromise the operation or viability of a public house. Where such proposals would not compromise the operation or viability of the public house, developers must put in place measures that would mitigate the impacts of noise for new and subsequent residents (see Policy D13 Agent of Change).

Chapter 8

Green Infrastructure and Natural Environment

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Policy G1 Green infrastructure

A London's network of green and open spaces, and green features in the built environment, should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated way to achieve multiple benefits.

B Boroughs should prepare green infrastructure strategies that identify opportunities for cross-borough collaboration, ensure green infrastructure is optimised and consider green infrastructure in an integrated way as part of a network consistent with Part A.

C Development Plans and area-based strategies should use evidence, including green infrastructure strategies, to:

1) identify key green infrastructure assets, their function and their potential function

2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

D Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

8.1.1 A **green infrastructure approach** recognises that the network of green and blue spaces,[133] street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in an integrated way. Policy G1 sets out the strategic green infrastructure approach and provides a framework for how this can be assessed and planned for. The remaining policies in this chapter provide more detail on specific aspects of green infrastructure, which work alongside other policies in the Plan to achieve multiple objectives. Objectives include: promoting mental and physical health and wellbeing; adapting to the impacts of climate change and the urban heat-island effect; improving air and water quality; encouraging walking and cycling; supporting landscape and heritage conservation; learning about the environment; supporting food growing and conserving and enhancing

133 London's waterways and their multifunctional role are specifically addressed in Policy SI 14 Waterways – strategic role to Policy SI 17 Protecting and enhancing London's waterways.

biodiversity and ecological resilience alongside more traditional functions of green space such as play, sport and recreation.

8.1.2 All development takes place within a wider environment and green infrastructure should be an integral element and not an 'add-on'. Its **economic and social value** should be recognised as highlighted in the London i-Tree Assessment[134] and the Natural Capital Account for London's Public Parks.[135]

8.1.3 To help deliver on his manifesto commitment to make more than half of London green by 2050, the Mayor will review and update existing Supplementary Planning Guidance on the All London Green Grid – London's strategic green infrastructure framework – to provide **guidance** on the strategic green infrastructure network and the preparation of green infrastructure strategies.

Policy G2 London's Green Belt

A The Green Belt should be protected from inappropriate development:

1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist,

2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.

B Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.

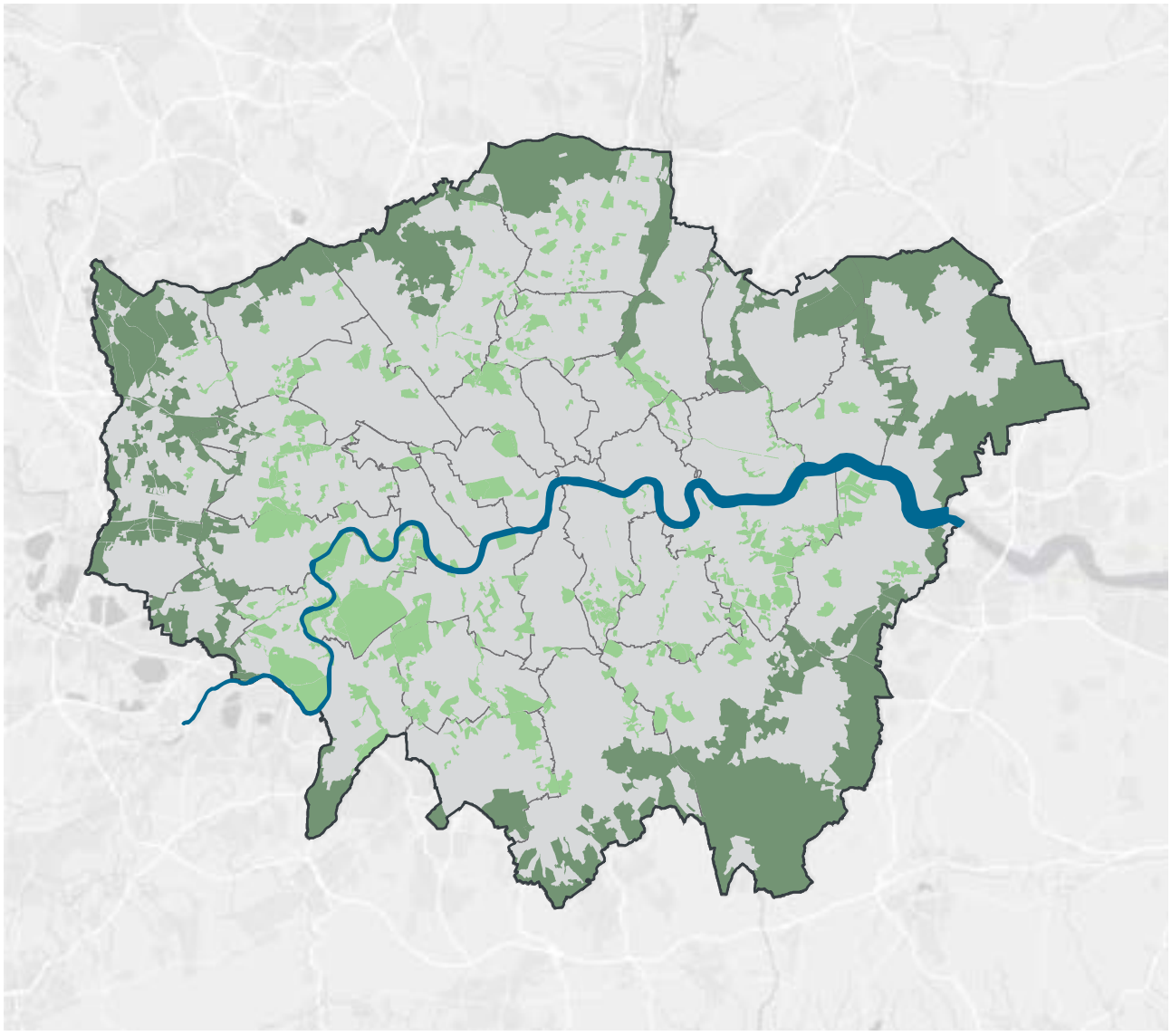
134 Valuing London's Urban Forest - Results of the London i-Tree Eco Project, Treeconomics, 2015, https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/valuing-londons-urban-forest

135 Natural capital accounts for public green space in London, Vivid Economics, 2017, https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/green-infrastructure/natural-capital-account-london?source=vanityurl

8.2.1 The Mayor strongly supports the **continued protection of London's Green Belt**. The NPPF provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. London's Green Belt makes up 22 per cent of London's land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for recreation. It also provides the vital function of containing the further expansion of built development. This has helped to drive the re-use and intensification of London's previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment.

8.2.2 Openness and permanence are essential characteristics of the Green Belt, but, despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and climate resilience. The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to **improve the quality** of these areas in ways that are appropriate within the Green Belt.

Figure 8.1 - Green Belt and Metropolitan Open Land



Green Belt and Metropolitan Open Land

- Green Belt
- Metropolitan Open Land

Source: Borough Local Plans

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Policy G3 Metropolitan Open Land

A Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt:

1) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt
2) boroughs should work with partners to enhance the quality and range of uses of MOL.

B The extension of MOL designations should be supported where appropriate. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:

1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area
2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B.

8.3.1 Metropolitan Open Land is strategic open land within the urban area. It plays an important role in London's green infrastructure – the network of green spaces, features and places around and within urban areas. **MOL protects and enhances the open environment** and improves Londoners' quality of life by providing localities which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity.

8.3.2 Metropolitan Open Land is afforded the same status and protection as Green Belt land. Any proposed **changes to existing MOL boundaries** must

be accompanied by thorough evidence which demonstrates that there are exceptional circumstances consistent with the requirements of national policy.

8.3.3 Additional stretches of the River Thames should not be designated as Metropolitan Open Land, as this may restrict the use of the river for transport infrastructure related uses. In considering whether there are exceptional circumstances to change MOL boundaries alongside the Thames and other waterways, boroughs should have regard to Policy SI 14 Waterways – strategic role to Policy SI 17 Protecting and enhancing London's waterways and the need for certain types of development to help maximise the multifunctional benefits of waterways including their role in transporting passengers and freight.

8.3.4 Proposals to **enhance access to MOL** and to improve poorer quality areas such that they provide a wider range of benefits for Londoners that are appropriate within MOL will be encouraged. Examples include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage.

Policy G4 Open space

A Development Plans should:

1) undertake a needs assessment of all open space to inform policy. Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for the different types required.[136] Assessments should take into account the quality, quantity and accessibility of open space
2) include appropriate designations and policies for the protection of open space to meet needs and address deficiencies
3) promote the creation of new areas of publicly-accessible open space particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change
4) ensure that open space, particularly green space, included as part of development remains publicly accessible.

136 Areas of Deficiency in Access to Public Open Space, GiGL, https://www.gigl.org.uk/open-spaces/areas-of-deficiency-in-access-to-public-open-space/?highlight=open%20space%20deficiency

B Development proposals should:

1) not result in the loss of protected open space
2) where possible create areas of publicly accessible open space, particularly in areas of deficiency.

8.4.1 Open spaces, particularly those planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits, and are a **vital component of London's infrastructure**. All types of open space, regardless of their function, are valuable in their ability to connect Londoners to open spaces at the neighbourhood level. Connectivity across the network of open spaces is particularly important as this provides opportunities for walking and cycling. Green spaces are especially important for improving wildlife corridors.

8.4.2 Boroughs should undertake an open space needs assessment, which should be in-line with objectives in **green infrastructure strategies** (Policy G1 Green infrastructure) (drawing from existing strategies such as play, trees and playing pitches). These strategies and assessments should inform each other to deliver multiple benefits in recognition of the cross-borough function and benefits of some forms of green infrastructure. Assessments should take into account all types of open space, including open space that is not publicly accessible, to inform local plan policies and designations.

8.4.3 The creation of new open space, particularly green space, is essential in helping to meet the Mayor's target of making more than 50 per cent of London green by 2050. **New provision or improved public access** should be particularly encouraged in areas of deficiency in access to public open space. It is important to secure appropriate management and maintenance of open spaces to ensure that a wide range of benefits can be secured and any conflicts between uses are minimised.

8.4.4 Proposals to **enhance open spaces** to provide a wider range of benefits for Londoners will be encouraged. Examples could include improved public access, inclusive design, recreation facilities, habitat creation, landscaping improvement or Sustainable Drainage Systems (SuDS).

Table 8.1 - Public open space categorisation

Open Space categorisation	Description	Size guideline	Distance from homes
Regional Parks	These are large areas, corridors or networks of open space, the majority of which will be publicly-accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. They offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.	400 ha	3.2 to 8 km
Metropolitan Parks	These are large areas of open space that provide a similar range of benefits to Regional Parks and offer a combination of facilities at a sub-regional level. They are readily accessible by public transport and are managed to meet best practice quality standards.	60 ha	3.2 km
District Parks	These are large areas of open space that provide a landscape setting with a variety of natural features. They provide a wide range of activities, including outdoor sports facilities and playing fields, children's play for different age groups and informal recreation pursuits.	20 ha	1.2 km
Local Parks and Open Spaces	These provide for court games, children's play, sitting out areas and nature conservation areas.	2 ha	400 m

Open Space categorisation	Description	Size guideline	Distance from homes
Small Open Spaces	These include public gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas.	under 2 ha	less than 400 m
Pocket Parks	These are small areas of open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and play equipment.	under 0.4 ha	less than 400 m
Linear Open Spaces	These are open spaces and towpaths alongside the Thames, canals and other waterways, paths, disused railways, nature conservation areas and other routes that provide opportunities for informal recreation. They can often be characterised by elements that are not public open space but that contribute to the enjoyment of the space.	N/A	N/A

This table gives examples of typical open space typologies in London; other open space types may be included to reflect local circumstances

Policy G5 Urban greening

A Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

B Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

C Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

8.5.1 The inclusion of **urban greening measures** in new development will result in an increase in green cover, and **should be integral to planning** the layout and design of new buildings and developments. This should be considered from the beginning of the design process.

8.5.2 **Urban greening** covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can help to meet other policy requirements and provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity – the latter being especially important in the most densely developed parts of the city where traditional green space is limited. The management and ongoing maintenance of green infrastructure should be considered and secured through the planning system where appropriate.

8.5.3 A number of cities have successfully adopted a 'green space factor' to encourage more and better urban greening. The Mayor has developed a generic **Urban Greening Factor** model to assist boroughs and developers in determining the appropriate provision of urban greening for new developments.

This is based on a review of green space factors in other cities.[137] The factors outlined in Table 8.2 are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaption and biodiversity conservation.

8.5.4 The UGF is currently only applied to major applications, but may eventually be applied to applications below this threshold as boroughs develop their own models. London is a diverse city so it is appropriate that each borough develops its own approach in response to its local circumstances. However, the challenges of climate change, poor air quality and deficiencies in green space need to be tackled now, so while each borough develops its own bespoke approach the Mayor has recommended the standards set out above. Further guidance will be developed to support implementation of the Urban Greening Factor.

8.5.5 Residential development places greater demands on **existing green infrastructure** and, as such, a higher standard is justified. Commercial development includes a range of uses and a variety of development typologies where the approach to urban greening will vary. Whilst the target score of 0.3 does not apply to B2 and B8 uses, these uses will still be expected to set out what measures they have taken to achieve urban greening on-site and quantify what their UGF score is.

8.5.6 The Urban Greening Factor for a proposed development is calculated in the following way:

(Factor A x Area) + (Factor B x Area) + (Factor C x Area) etc. divided by Total Site Area.

So, for example, an office development with a 600 sq.m. footprint on a site of 1,000 sq.m. including a green roof, 250 sq.m. car parking, 100 sq.m. open water and 50 sq.m. of amenity grassland would score the following;

(0.7 x 600) + (0.0 x 250) + (1 x 100) + (0.4 x 50) / 1000 = 0.54

8.5.7 So, in this example, the proposed office development exceeds the interim target score of 0.3 for a predominately commercial development under Part B of Policy G5 Urban greening.

137 Urban Greening Factor for London, The Ecology Consultancy, 2017, https://www.london.gov.uk/sites/default/files/urban_greening_factor_for_london_final_report.pdf

Table 8.2 - Urban Greening Factors

Surface Cover Type	Factor
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm – see livingroofs.org for descriptions.[A]	0.8
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree – see Trees in Hard Landscapes for overview.[B]	0.8
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.[C]	0.7
Flower-rich perennial planting – see RHS perennial plants for guidance.[D]	0.7
Rain gardens and other vegetated sustainable drainage elements – See CIRIA for case-studies.[E]	0.7
Hedges (line of mature shrubs one or two shrubs wide) – see RHS for guidance.[F]	0.6
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6
Green wall –modular system or climbers rooted in soil – see NBS Guide to Façade Greening for overview.[G]	0.6
Groundcover planting – see RHS Groundcover Plants for overview.[H]	0.5
Amenity grassland (species-poor, regularly mown lawn).	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.[I]	0.3
Water features (chlorinated) or unplanted detention basins.	0.2
Permeable paving – see CIRIA for overview.[J]	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0

Notes for Table 8.2

A. https://livingroofs.org/intensive-green-roofs/
B. http://www.tdag.org.uk/trees-in-hard-landscapes.html
C. https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf
D. https://www.rhs.org.uk/advice/profile?pid=868
E. http://www.susdrain.org/case-studies/
F. https://www.rhs.org.uk/advice/profile?pid=351
G. https://www.thenbs.com/knowledge/the-nbs-guide-to-facade-greening-part-two
H. https://www.rhs.org.uk/advice/profile?PID=818
I. https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf
J. https://www.susdrain.org/delivering-suds/using-suds/suds-components/source-control/pervious-surfaces/pervious-surface-types/pervious-surface-types.html

Policy G6 Biodiversity and access to nature

A Sites of Importance for Nature Conservation (SINCs) should be protected.

B Boroughs, in developing Development Plans, should:

1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context

5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

C Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

1) avoid damaging the significant ecological features of the site
2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
3) deliver off-site compensation of better biodiversity value.

D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

E Proposals which reduce deficiencies in access to nature should be considered positively.

8.6.1 **Sites of Importance for Nature Conservation** (SINCs) comprise:

1. Sites of Metropolitan Importance – strategically-important conservation sites for London
2. Sites of Borough Importance – sites which support habitats or species of value at the borough level
3. Sites of Local Importance – sites which are important for the provision of access to nature at the neighbourhood level.

Several Sites of Metropolitan Importance also have statutory European or national nature conservation designations (see paragraph 8.6.3)

8.6.2 The level of protection afforded to SINCS should be commensurate with their status and the contribution they make to wider ecological networks. When undertaking comprehensive reviews of SINCs across a borough, or when identifying or amending Sites of Metropolitan Importance, boroughs should consult the London Wildlife Sites Board.

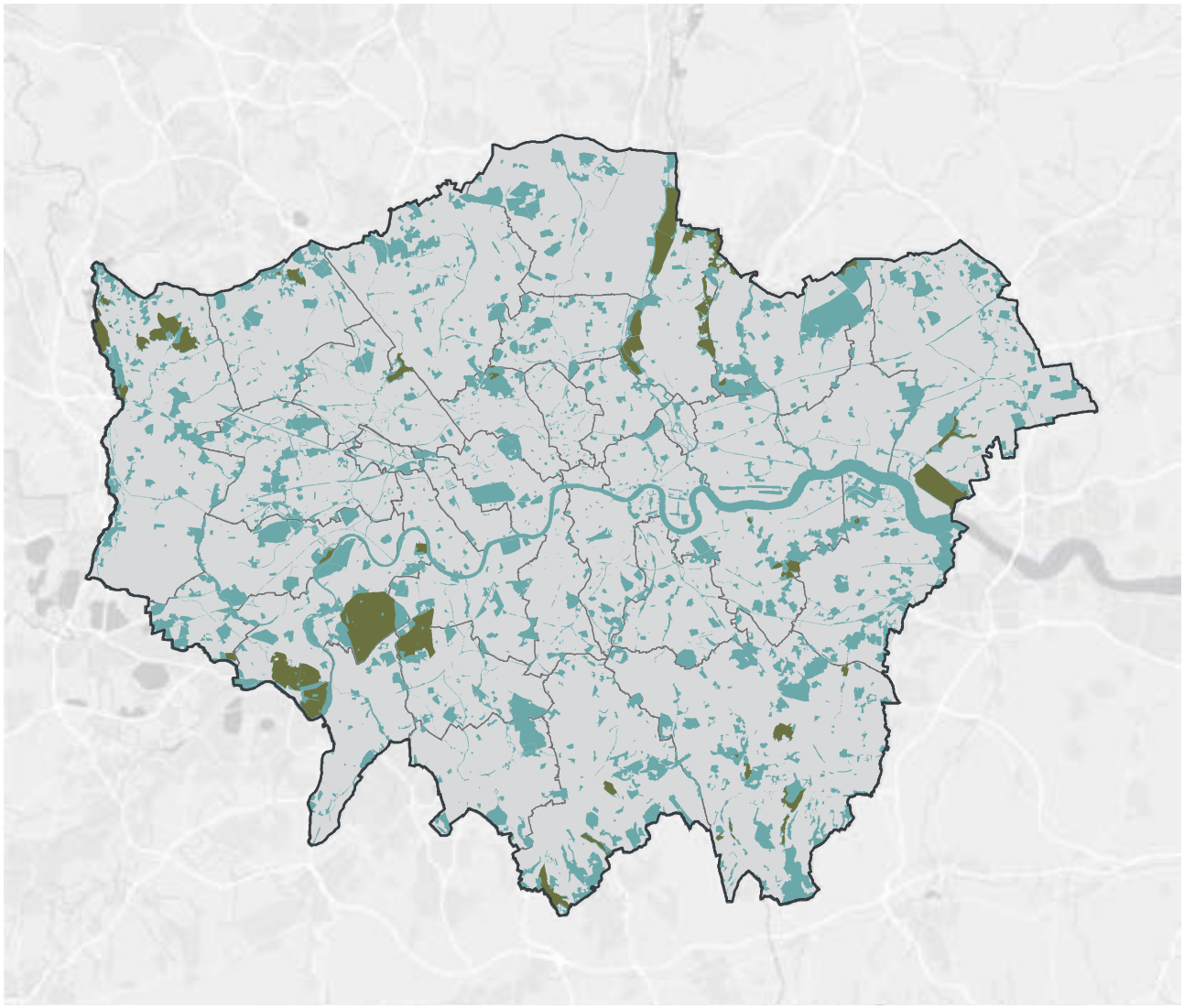
8.6.3 Sites with a formal **European or national designation** (including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest, National Nature Reserves and Local Reserves) are protected by legislation. There are legal provisions which ensure these sites are not harmed by development; there is a duty to consult Natural England on proposals that might affect these sites, and undertake an appropriate assessment of the potential impacts on European sites if a plan or project is likely to have a significant effect on the integrity of a European site.

8.6.4 Although heavily urbanised, London consists of a **wide variety of important wildlife habitats**, including a number of sites which have national and international protection. These habitats range from semi-natural features such as chalk grasslands and ancient woodlands to more urban habitats such as reservoirs and vegetated railway corridors. The wildlife value of these sites must be protected and appropriate maintenance regimes should be established to maintain or enhance the wildlife value of sites, recognising the additional pressure some sites may experience due to London's projected growth. Improved sustainable access to wildlife sites should be secured, where appropriate, so that Londoners can better experience and appreciate the natural environment within the city. The connections between protected sites – green corridors – are often critical in helping to sustain wildlife populations that would be vulnerable if they were confined to isolated areas of habitat. London's water spaces make up an important set of habitats in London. Policy SI 17 Protecting and enhancing London's waterways addresses the protection of water spaces, with a particular priority for improving and restoring them. The habitat value of waterways is a key element of their future management.

8.6.5 Development proposals that are adjacent to or near **SINCs or green corridors** should consider the potential impact of indirect effects to the site, such as noise, shading or lighting. There may also be opportunities for new development to contribute to enhancing the nature conservation value of an adjacent SINC or green corridor by, for example, sympathetic landscaping that provides complementary habitat. The London Environment Strategy includes guidance on identifying SINCs (Appendix 5) as well as habitat creation targets and a comprehensive list of priority species and habitats that require particular consideration when planning decisions are made. The London Wildlife Sites Board offers help and guidance to boroughs on the selection of SINCs.[138]

138 Tree and Woodland Strategy Guidance, Mayor of London, 2013, https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/tree-and-woodland

Figure 8.2 - Designated nature conservation sites



Sites of Importance for Nature Conservation and Sites of Special

- Sites of Importance for Nature Conservation (SINC)
- Sites of Special Scientific Interest (SSSI)

Source: Greenspace Information for Greater London (GiGL)

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8.6.6 Biodiversity net gain is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost. This approach does not change the fact that losses should be avoided, and biodiversity offsetting is the option of last resort. The Mayor will be producing guidance to set out how biodiversity net gain applies in London.

Policy G7 Trees and woodlands

A London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.

B In their Development Plans, boroughs should:

1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site[139]
2) identify opportunities for tree planting in strategic locations.

C Development proposals should ensure that, wherever possible, existing trees of value are retained.[140] If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

139 Forestry Commission/Natural England (2018): Ancient woodland and veteran trees; protecting them from development, https://www.gov.uk/guidance/planning-applications-affecting-trees-and-woodland

140 Category A, B and lesser category trees where these are considered by the local planning authority to be of importance to amenity and biodiversity, as defined by BS 5837:2012

8.7.1 **Trees and woodlands play an important role** within the urban environment. They help to trap air pollutants, add to amenity, provide shading, absorb rainwater and filter noise. They also provide extensive areas of habitat for wildlife, especially mature trees. The urban forest is an important element of London's green infrastructure and comprises all the trees in the urban realm, in both public and private spaces, along linear routes and waterways, and in amenity areas. The Mayor and Forestry Commission have previously published a London Tree and Woodland Framework and Supplementary Planning Guidance on preparing tree strategies to help boroughs plan for the management of the urban forest.[141] These, and their successor documents, should inform policies and proposals in boroughs' wider green infrastructure strategies.

8.7.2 The Mayor wants to increase tree canopy cover in London by 10 per cent by 2050. Green infrastructure strategies can be used to help boroughs identify locations where there are strategic opportunities for tree planting to maximise potential benefits. Trees should be designed into developments from the outset to maximise tree planting opportunities and optimise establishment and vigorous growth. When preparing more detailed planning guidance boroughs are also advised to refer to sources such as Right Trees for a Changing Climate[142] and guidance produced by the Trees and Design Action Group.[143]

8.7.3 An i-Tree Eco Assessment of London's trees quantified the benefits and services provided by the capital's **urban forest**.[144] This demonstrated that London's existing trees and woodlands provide services (such as pollution removal, carbon storage, and storm water attenuation) valued at £133 million per year. The cost of replacing these services if the urban forest was lost was calculated at £6.12 billion. Consequently, when trees are removed the asset is degraded and the compensation required in terms of substitute planting to replace services lost should be based on a recognised tree valuation method such as CAVAT[145] or i-Tree Eco.[146]

141 Tree and Woodland Strategy Guidance, Mayor of London, 2013, https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/tree-and-woodland

142 The Right Trees for Changing Climate Database, http://www.righttrees4cc.org.uk/

143 Trees and Design Action Group guidance, http://www.tdag.org.uk/guides--resources.html

144 Valuing London's Urban Forest - Results of the London i-Tree Eco Project, Treeconomics, 2015, https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/valuing-londons-urban-forest

145 CAVAT, https://www.ltoa.org.uk/resources/cavat

146 i-Tree Eco, https://www.itreetools.org/

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Policy G8 Food growing

A In Development Plans, boroughs should:

1) protect existing allotments and encourage provision of space for urban agriculture, including community gardening, and food growing within new developments and as a meanwhile use on vacant or under-utilised sites
2) identify potential sites that could be used for food production.

8.8.1 Providing land for food growing helps to support the **creation of a healthier food environment**. At the local scale, it can help promote more active lifestyles and better diets, and improve food security. Community food growing not only helps to improve social integration and community cohesion but can also contribute to improved mental and physical health and wellbeing.

8.8.2 As provision for **small-scale** food growing becomes harder to deliver, innovative solutions to its delivery should be considered, such as green roofs and walls, re-utilising existing under-used spaces and incorporating spaces for food growing in community schemes such as in schools. Where sites are made available for food growing on a temporary basis landowners/developers will need to be explicit over how long sites will be available to the community.

8.8.3 At a more **macro scale**, providing land for food growing helps to support farming and agriculture. Providing food closer to source helps to create a sustainable food network for the city, supports the local economy, and reduces the need to transport food, thereby reducing transport emissions and helping to address climate change. There are also longer-term biodiversity benefits, and farmers adopting agri-environmental stewardship schemes are more likely to deliver good environmental practice. For all food growing, consideration should be given to the historic use of the land and any potential contamination.

8.8.4 The **Mayor's Food Strategy** prioritises the need to help all Londoners to be healthier and for the food system to have less of a negative environmental impact.

8.8.5 The **Capital Growth network** is London's food growing network, which continues to promote community food growing across the capital, as well as delivering food-growing skills and employment opportunities for Londoners.

Policy G9 Geodiversity

A In Development Plans, boroughs should:

1) establish clear goals for the management of identified sites to promote public access, appreciation and interpretation of geodiversity
2) ensure geological sites of European, national or regional conservation importance are clearly identified.

B Development proposals should:

1) make a positive contribution to the protection and enhancement of geodiversity
2) protect Regionally Important Geological Sites (RIGS)
3) give Locally Important Geological Sites (LIGS) the level of protection commensurate with their importance.

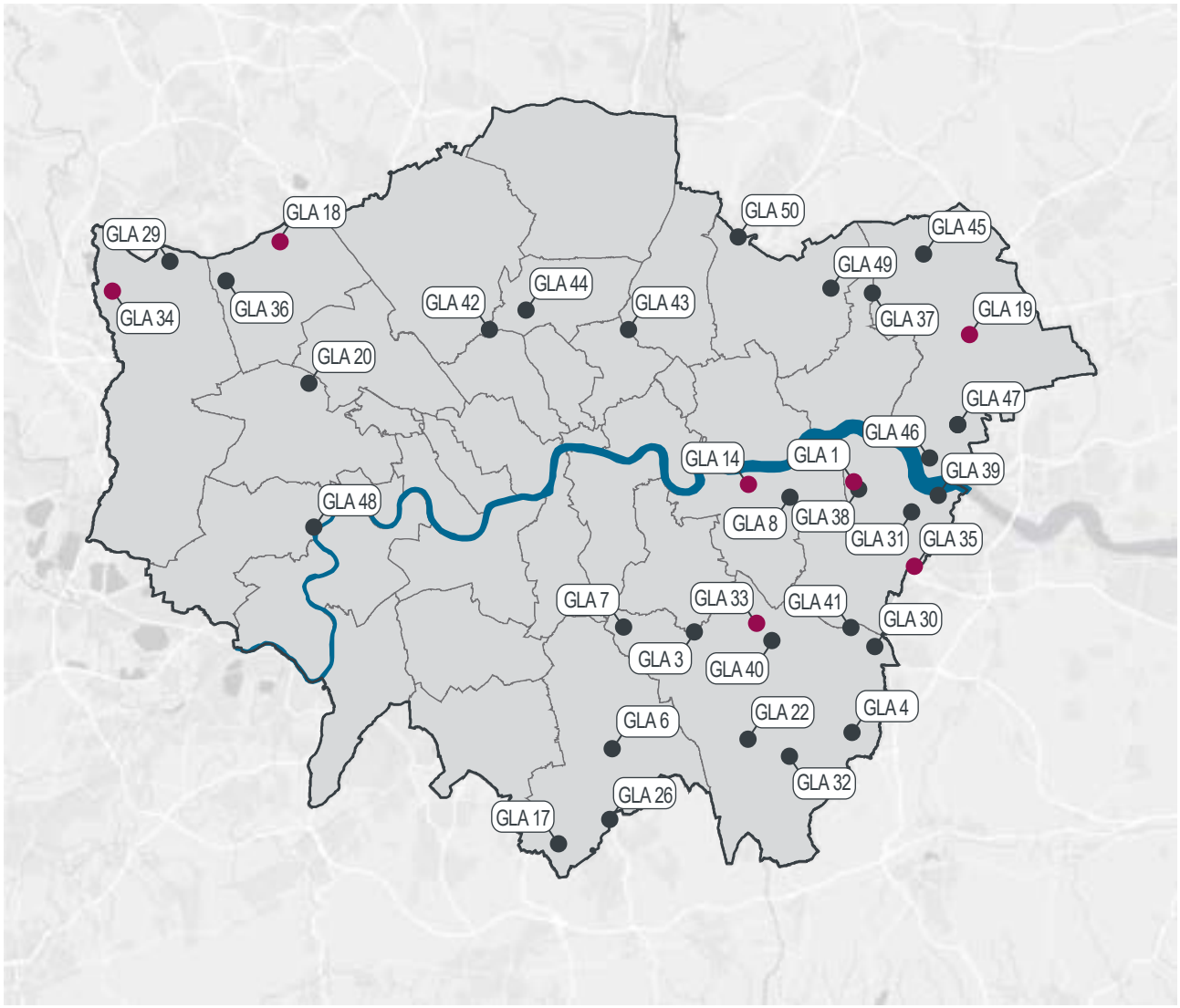
8.9.1 **Geodiversity** is a fundamental cornerstone of our everyday lives. Geology affects where we build, how we construct buildings and how we deliver associated services. It influences the design and layout of infrastructure, filters our drinking water and underpins the landscape around us. Geodiversity cannot be replaced or recreated (other than on geological timescales).

8.9.2 London's geodiversity sites are shown in Figure 8.3. Geodiversity sites with existing or proposed European or national designations are Sites of Special Scientific Interest and subject to statutory protection. Boroughs should protect and enhance RIGSs and LIGSs through their Development Plans. The Mayor will continue to work with the London Geodiversity Partnership to promote geodiversity and will prepare updated Supplementary Planning Guidance as necessary.

8.9.3 Geodiversity sites should be recognised for their importance in providing **habitats for biodiversity** and in allowing delivery of ecosystem services.

8.9.4 Where appropriate, access should be provided to geodiversity sites, although it is recognised that this is not always desirable. Geological sites will require appropriate **maintenance regimes** to ensure that these assets are properly protected and managed.

Figure 8.3 - Geodiversity sites



Sites of National and Regional Geodiversity Importance

- Sites of Special Scientific Interest (SSSIs)
- Recommended Regionally Important Geologial Sites (RIGS)

Reference numbers refer to the appendices of the London Foundations SPG 2012

Source: GLA Planning

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Chapter 9

Sustainable Infrastructure

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Policy SI 1 Improving air quality

A Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.

B To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:

1) Development proposals should not:
   a) lead to further deterioration of existing poor air quality
   b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
   c) create unacceptable risk of high levels of exposure to poor air quality.

2) In order to meet the requirements in Part 1, as a minimum:
   a) development proposals must be at least Air Quality Neutral
   b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures
   c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1
   d) development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

C Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:

1) how proposals have considered ways to maximise benefits to local air quality, and
2) what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.

D In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.[147]

E Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.

147 The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance, Mayor of London, 2014

9.1.1 **Poor air quality** is a major issue for London which is failing to meet requirements under legislation. Poor air quality has direct impacts on the health, quality of life and life expectancy of Londoners. The impacts tend to be most heavily felt in some of London's most deprived neighbourhoods, and by people who are most vulnerable to the impacts, such as children and older people. London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced.

9.1.2 The Mayor is committed to **making air quality in London the best of any major world city**, which means not only achieving compliance with legal limits for Nitrogen Dioxide as soon as possible and maintaining compliance where it is already achieved, but also achieving World Health Organisation targets for other pollutants such as Particulate Matter.

9.1.3 The aim of this policy is to ensure that new developments are designed and built, as far as is possible, **to improve local air quality and reduce the extent to which the public are exposed to poor air quality**. This means that new developments, as a minimum, must not cause new exceedances of legal air

quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits.[148] Where limit values are already met, or are predicted to be met at the time of completion, new developments must endeavour to maintain the best ambient air quality compatible with sustainable development principles.

9.1.4 Where this policy refers to 'existing poor air quality' this should be taken to include areas where legal limits for any pollutant, or World Health Organisation targets for Particulate Matter, are already exceeded and areas where current pollution levels are within 5 per cent of these limits.[149]

9.1.5 For major developments, **a preliminary Air Quality Assessment** should be carried out before designing the development to inform the design process. The aim of a preliminary assessment is to assess:

- The most significant sources of pollution in the area
- Constraints imposed on the site by poor air quality
- Appropriate land uses for the site
- Appropriate design measures that could be implemented to ensure that development reduces exposure and improves air quality.

9.1.6 **Further assessments** should then be carried out as the design evolves to ensure that impacts from emissions are prevented or minimised as far as possible, and to fully quantify the expected effect of any proposed mitigation measures, including the cumulative effect where other nearby developments are also underway or likely to come forward.

9.1.7 **Assessment of the impacts** of a scheme on local air pollution should include fixed plant, such as boiler and emergency generators, as well as expected transport-related sources. The impact assessment part of an Air Quality Assessment should always include all relevant pollutants. Industrial, waste and other working sites may need to include on-site vehicles and mobile machinery as well as fixed machinery and transport sources.

9.1.8 The impact assessment should provide decision makers with sufficient information to understand the **scale and geographic scope of any detrimental,**

148 Air Quality Standards Regulations, 2010 (or subsequent revisions thereof), http://www.legislation.gov.uk/uksi/2010/1001/contents/made

149 Land-Use Planning & Development Control: Planning for Air Quality, Institution of Air Quality Management, 2017, http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf. This guidance indicates that even very small impacts on ambient air quality cannot be considered 'negligible' where existing levels are within 5% of limits.

or beneficial, impacts on air quality and enable them to exercise their professional judgement in deciding whether the impacts are acceptable, in line with best practice.

9.1.9 Meeting the **Air Quality Neutral benchmarks**,[150] although necessary to control the growth in London's regional emissions, will not always be sufficient to prevent unacceptable local impacts, as these may be affected by other factors, such as the location of the emissions source, the rate of emissions (as opposed to the annual quantum) and the layout of the development in relation to the surrounding area. As developments can still have significant local impacts that are not captured by Air Quality Neutral, for example by concentrating emissions, increasing exposure or preventing dispersion in particular locations, it is still important for these impacts to be assessed and mitigated.

9.1.10 For most **minor developments**, achieving Air Quality Neutral will be enough to demonstrate that they are in accordance with Part B1 of this policy. However, where characteristics of the development or local features raise concerns about air quality, or where there are additional requirements for assessment in local policy, a full Air Quality Assessment may be required. Additional measures may also be needed to address local impacts. Guidance on Air Quality Neutral will set out streamlined assessment procedures for minor developments.

9.1.11 An **air quality positive approach** is linked to other policies in the London Plan, such as Healthy Streets, energy masterplanning and green infrastructure. One of the keys to delivering this will be to draw existing good practice together in a holistic fashion, at an early stage in the process, to ensure that the development team can identify which options deliver the greatest improvement to air quality. Large schemes, subject to Environmental Impact Assessments, commonly have project and design teams representing a range of expertise, that can feed in to the development of a statement to set out how air quality can be improved across the proposed area of the development.

9.1.12 **Single-site schemes**, including referable schemes, are often constrained by pre-existing urban form and structure, transport and heat networks. These constraints may limit their ability to consider how to actively improve local air quality. By contrast, large schemes, particularly **masterplans**, usually have more flexibility to consider how new buildings, amenity and public spaces, transport and heat networks are deployed across the area and will therefore have greater opportunities to improve air quality and reduce exposure through the careful choice of design and infrastructure solutions. Delivery of an air quality positive

150 See Glossary

approach will be project specific and will rely on the opportunities on site or in the surrounding area to improve air quality.

9.1.13 **Statements for large-scale development proposals**, prepared in response to Part C of this policy, should set out:

- How air quality is intended to be analysed and opportunities for its improvement identified as part of the design process.
- How air quality improvements have informed the design choices made about layout and distribution of buildings, amenity spaces and infrastructure.
- What steps will be taken to promote the uptake and use of sustainable and zero-emission modes of transport beyond minimum requirements. This may include specific measures in transport plans or delivery against Healthy Streets indicators.
- How air pollutant emissions from the buildings or associated energy centres can be reduced beyond the minimum requirements set out in Part B of this policy. This may include specific measures in heating masterplans or working with existing heat network providers to reduce or eliminate energy centre emissions.
- How specific measures that are identified to deliver air quality improvements will be evaluated and secured, including whether more detailed design specifications will be required so that the final development meets the desired performance.

9.1.14 The GLA will produce **guidance** in order to assist developers and boroughs in identifying measures and best practice to inform the preparation of statements for developments taking an air quality positive approach.

9.1.15 Where the Air Quality Assessment or the air quality positive approach assumes that specific measures are put in place to improve air quality, prevent or mitigate air quality impacts, these should be secured through the **use of planning conditions or s106 agreements**. For instance, if ultra-low NOx boilers are assumed in the assessment, conditions should require the provision of details of the installed plant prior to the occupation of the building, or where larger plant is used for heating, post installation emissions tests should be required to ensure that the modelled emission parameters are achieved.

9.1.16 The GLA maintains and publishes an **inventory of emission sources** (the London Atmospheric Emissions Inventory or LAEI). This inventory is based on a detailed assessment of all current sources of pollution in London and can be used to help understand the existing environment at development sites.

9.1.17 **Air Quality Focus Areas** (AQFA) are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO2) but are also locations with high human exposure. AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned national, regional and local measures to reduce air pollution may not fully resolve poor air quality issues. There are currently 187 AQFAs across London (Figure 9.1). The list of Air Quality Focus Areas is updated from time to time as the London Atmospheric Inventory is reviewed and the latest list in the London Datastore should always be checked.

9.1.18 AQFAs are distinct from **Air Quality Management Areas**. Air Quality Management Areas (AQMAs) are declared by the London boroughs in response to modelled or measured existing exceedances of legal air quality limits. The analysis underpinning AQMAs is often more spatially detailed than London-wide modelling and may include the identification of additional air quality hot spots or other local issues.

9.1.19 All London boroughs have declared AQMAs covering some or all of their area. Boroughs are required to produce **Air Quality Action Plans** setting out the actions they are taking to improve local air quality; planning decisions should be in accordance with these action plans and developers should take any local requirements in Air Quality Action Plans into account.

9.1.20 AQFAs are defined based on GLA modelling forecasts that incorporate actions taken by the GLA and others as well as broader changes in emissions sources and are not intended to supplant the role of AQMAs in planning decisions. In practice **developers will need to consider both designations** where they overlap.

9.1.21 It may not always be possible in practice for developments to achieve Air Quality Neutral standards or to acceptably minimise impacts using on-site measures alone. If a development can demonstrate that it has exploited all relevant on-site measures it may be possible to make the development acceptable through **additional mitigation or offsetting payments**.

9.1.22 Where there have been significant **improvements to air quality** resulting in an area no longer exceeding air quality limits, Development Plans should not take advantage of this investment and worsen the local air quality back to a poor level. The sustainability appraisal for local plans should consider the effect of national, London-wide and local programmes to improve air quality to ensure that any potential conflicts are avoided.

9.1.23 **Further guidance** will be published on Air Quality Neutral and air quality positive approaches as well as guidance on how to reduce construction and demolition impacts.

Figure 9.1 - Air Quality Focus Areas

London's Air Quality Focus Areas

● Air Quality Focus Area (AQFA)

Source: GLA Environment

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Policy SI 2 Minimising greenhouse gas emissions

A Major development should be net zero-carbon.[151] This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

1) be lean: use less energy and manage demand during operation
2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
4) be seen: monitor, verify and report on energy performance.

B Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

C A minimum on-site reduction of at least 35 per cent beyond Building Regulations[152] is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:

1) through a cash in lieu contribution to the borough's carbon offset fund, or
2) off-site provided that an alternative proposal is identified and delivery is certain.

D Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.

151 Where zero-carbon is used in the Plan it refers to net zero-carbon – see Glossary for definition.

152 Building Regulations 2013. If these are updated, the policy threshold will be reviewed. https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l

E Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.

F Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

9.2.1 The Mayor is committed to London **becoming a zero-carbon city**. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent.[153] London's homes and workplaces are responsible for producing approximately 78 per cent of its greenhouse gas emissions. If London is to achieve its objective of becoming a zero-carbon city by 2050, new development needs to meet the requirements of this policy. Development involving major refurbishment should also aim to meet this policy.

9.2.2 **The energy hierarchy** (Figure 9.2) should inform the design, construction and operation of new buildings. The priority is to minimise energy demand, and then address how energy will be supplied and renewable technologies incorporated. An important aspect of managing demand will be to reduce peak energy loadings.

9.2.3 Boroughs should ensure that all developments maximise opportunities for **on-site electricity and heat production** from solar technologies (photovoltaic and thermal) and use innovative building materials and smart technologies. This approach will reduce carbon emissions, reduce energy costs to occupants, improve London's energy resilience and support the growth of green jobs.

9.2.4 A zero-carbon target for major residential developments has been in place for London since October 2016 and applies to **major non-residential developments** on final publication of this Plan.

153 'Carbon' is used in the London Plan as a shorthand term for all greenhouse gases. London's carbon accounting is measured in carbon dioxide equivalent, which includes the conversion of other greenhouse gases into their equivalent carbon dioxide emissions.

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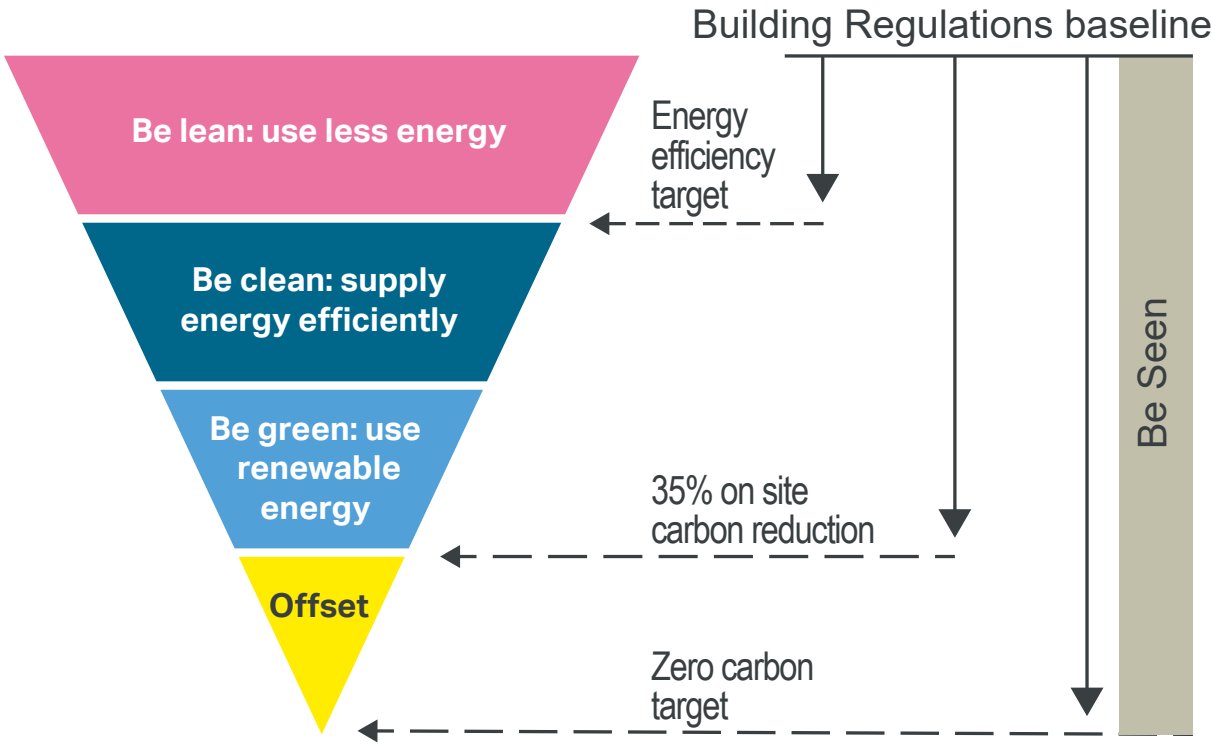
Figure 9.2 - The energy hierarchy and associated targets



Source: Greater London Authority

9.2.5 To meet the zero-carbon target, an on-site reduction of at least 35 per cent beyond the baseline of Part L of the current Building Regulations is required.[154] The minimum **improvement over the Target Emission Rate** (TER) will increase over a period of time in order to achieve the zero-carbon London ambition and reflect the costs of more efficient construction methods. This will be reflected in future updates to the London Plan.

9.2.6 The Mayor recognises that **Building Regulations** use outdated carbon emission factors and that this will continue to cause uncertainty until they are updated by Government. Interim guidance has been published in the Mayor's Energy Planning Guidance on the use of appropriate emissions factors. This guidance will be updated again once Building Regulations are updated to help provide certainty to developers on how these policies are implemented.

154 Building Regulations 2013. If these are updated, the policy threshold will be reviewed. https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l

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9.2.7 Developments are expected to achieve carbon reductions beyond Part L from **energy efficiency measures** alone to reduce energy demand as far as possible. Residential development should achieve 10 per cent and non-residential development should achieve 15 per cent over Part L. Achieving energy credits as part of a Building Research Establishment Environmental Assessment Method (BREEAM) rating can help demonstrate that energy efficiency targets have been met. Boroughs are encouraged to include BREEAM targets in their Local Plans where appropriate.

9.2.8 The price for offsetting carbon[155] is regularly reviewed. Changes to the GLA's suggested **carbon offset price** will be updated in future guidance. New development is expected to get as close as possible to zero-carbon on-site, rather than relying on offset fund payments to make up any shortfall in emissions. However, **offset funds** have the potential to unlock carbon savings from the existing building stock through energy efficiency programmes and by installing renewable technologies – typically more expensive to deliver in London due to the building age, type and tenure.

9.2.9 The Mayor provides **support to boroughs** by advising those which are at the early stages of setting up their carbon offsetting funds, and by setting out guidance on how to select projects. To ensure that offset funds are used effectively to reduce carbon whilst encouraging a holistic approach to retrofitting, Mayoral programmes offer additional support.[156]

9.2.10 The move towards zero-carbon development requires comprehensive **monitoring of energy demand and carbon emissions** to ensure that planning commitments are being delivered. Major developments are required to monitor and report on energy performance, such as by displaying a Display Energy Certificate (DEC), and reporting to the Mayor for at least five years via an online portal to enable the GLA to identify good practice and report on the operational performance of new development in London.

9.2.11 Operational carbon emissions will make up a declining proportion of a development's whole life-cycle carbon emissions as operational carbon targets become more stringent. To fully capture a development's carbon impact, a **whole life-cycle approach** is needed to capture its unregulated emissions (i.e. those associated with cooking and small appliances), its embodied emissions

155 Boroughs should develop a price for offsetting carbon using either a nationally recognised carbon pricing mechanism or a price based on the cost of offsetting carbon across the borough. A nationally recognised non-traded price of £95/tonne has been tested as part of the viability assessment for the London Plan which boroughs may use to collect offset payments.

156 For examples see London Environment Strategy 2018.

(i.e. those associated with raw material extraction, manufacture and transport of building materials and construction) and emissions associated with maintenance, repair and replacement as well as dismantling, demolition and eventual material disposal). Whole life-cycle carbon emission assessments are therefore required for development proposals referable to the Mayor. Major non-referable development should calculate unregulated emissions and are encouraged to undertake whole life-cycle carbon assessments. The approach to whole life-cycle carbon emissions assessments, including when they should take place, what they should contain and how information should be reported, will be set out in guidance.

9.2.12 The Mayor may publish further planning guidance on sustainable design and construction[157] and will continue to regularly update the guidance on preparing **energy strategies** for major development. Boroughs are encouraged to request energy strategies for other development proposals where appropriate. As a minimum, energy strategies should contain the following information:

a. a calculation of the energy demand and carbon emissions covered by Building Regulations and, separately, the energy demand and carbon emissions from any other part of the development, including plant or equipment, that are not covered by the Building Regulations (i.e. the unregulated emissions), at each stage of the energy hierarchy

b. proposals to reduce carbon emissions beyond Building Regulations through the energy efficient design of the site, buildings and services, whether it is categorised as a new build, a major refurbishment or a consequential improvement

c. proposals to further reduce carbon emissions through the use of zero or low-emission decentralised energy where feasible, prioritising connection to district heating and cooling networks and utilising local secondary heat sources. (Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI 3 Energy infrastructure)

d. proposals to further reduce carbon emissions by maximising opportunities to produce and use renewable energy on-site, utilising storage technologies where appropriate

e. proposals to address air quality risks (see Policy SI 1 Improving air quality). Where an air quality assessment has been undertaken, this could be referenced instead

157 This will build on the 2014 Sustainable Design and Construction SPG.

f. the results of dynamic overheating modelling which should be undertaken in line with relevant Chartered Institution of Building Services Engineers (CIBSE) guidance, along with any mitigating actions (see Policy SI 4 Managing heat risk)

g. proposals for demand-side response, specifically through installation of smart meters, minimising peak energy demand and promoting short-term energy storage, as well as consideration of smart grids and local micro grids where feasible

h. a plan for monitoring and annual reporting of energy demand and carbon emissions post-construction for at least five years

i. proposals explaining how the site has been future-proofed to achieve zero-carbon on-site emissions by 2050

j. confirmation of offsetting arrangements, if required

k. a whole life-cycle carbon emissions assessment, and actions to reduce life-cycle carbon emissions (for development proposals referable to the Mayor)

l. analysis of the expected cost to occupants associated with the proposed energy strategy

m. proposals that connect to or create new heat networks should include details of the design and specification criteria and standards for their systems as set out in Policy SI 3 Energy infrastructure.

Policy SI 3 Energy infrastructure

A Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.

B Energy masterplans should be developed for large-scale development locations (such as those outlined in Part A and other opportunities) which establish the most effective energy supply options. Energy masterplans should identify:

1) major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)
2) heat loads from existing buildings that can be connected to future phases of a heat network
3) major heat supply plant including opportunities to utilise heat from energy from waste plants
4) secondary heat sources, including both environmental and waste heat
5) opportunities for low and ambient temperature heat networks
6) possible land for energy centres and/or energy storage
7) possible heating and cooling network routes
8) opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
9) infrastructure and land requirements for electricity and gas supplies
10) implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector
11) opportunities to maximise renewable electricity generation and incorporate demand-side response measures.

C Development Plans should:

1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure

2) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks.

D Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system:

1) the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
   a) connect to local existing or planned heat networks
   b) use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)
   c) use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)
   d) use ultra-low NOx gas boilers
2) CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of Policy SI 1 Improving air quality
3) where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.

E Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.

9.3.1 The Mayor will work with boroughs, energy companies and major developers to promote the **timely and effective development of London's energy system** (energy production, distribution, storage, supply and consumption).

9.3.2 London is part of a national energy system and currently sources approximately 95 per cent of its energy from outside the GLA boundary. Meeting the **Mayor's zero-carbon target by 2050** requires changes to the way we use and supply energy so that power and heat for our buildings and transport is generated from local clean, low-carbon and renewable sources. London will need to shift from its

reliance on using natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources. Decentralised energy and local secondary heat sources will become an increasingly important element of London's energy supply and will help London become more self-sufficient and resilient in relation to its energy needs.

9.3.3 Many of London's existing **heat networks** have grown around combined heat and power (CHP) systems. However, the carbon savings from gas engine CHP are now declining as a result of national grid electricity decarbonising, and there is increasing evidence of adverse air quality impacts. Heat networks are still considered to be an effective and low-carbon means of supplying heat in London, and offer opportunities to transition to zero-carbon heat sources faster than individual building approaches. Where there remains a strategic case for low-emission CHP systems to support area-wide heat networks, these will continue to be considered on a case-by-case basis. Existing networks will need to establish decarbonisation plans. These should include the identification of low- and zero-carbon heat sources that may be utilised in the future, in order to be zero-carbon by 2050. The Mayor will consider how boroughs and network operators can be supported to achieve this.

9.3.4 Developments should connect to existing heat networks wherever feasible. New and existing networks should incorporate good practice design and specification standards comparable to those set out in the CIBSE/ADE Code of Practice CP1 for the UK or equivalent. They should also register with the Heat Trust or an equivalent scheme. This will support the development of good quality networks whilst helping network operators prepare for regulation and ensuring that customers are offered a reliable, cost-competitive service. Stimulating the delivery of new district heating infrastructure enables the opportunities that district heating can provide for London's energy system to be maximised. The Mayor has identified **Heat Network Priority Areas**, which can be found on the London Heat Map website.[158] These identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers. Data relating to new and expanded networks will be regularly captured and made publicly available. Major development proposals outside Heat Network Priority Areas should select a low-carbon heating system that is appropriate to the heat demand of the development, provides a solution for managing peak demand, as with heat networks, and avoids high energy bills for occupants.

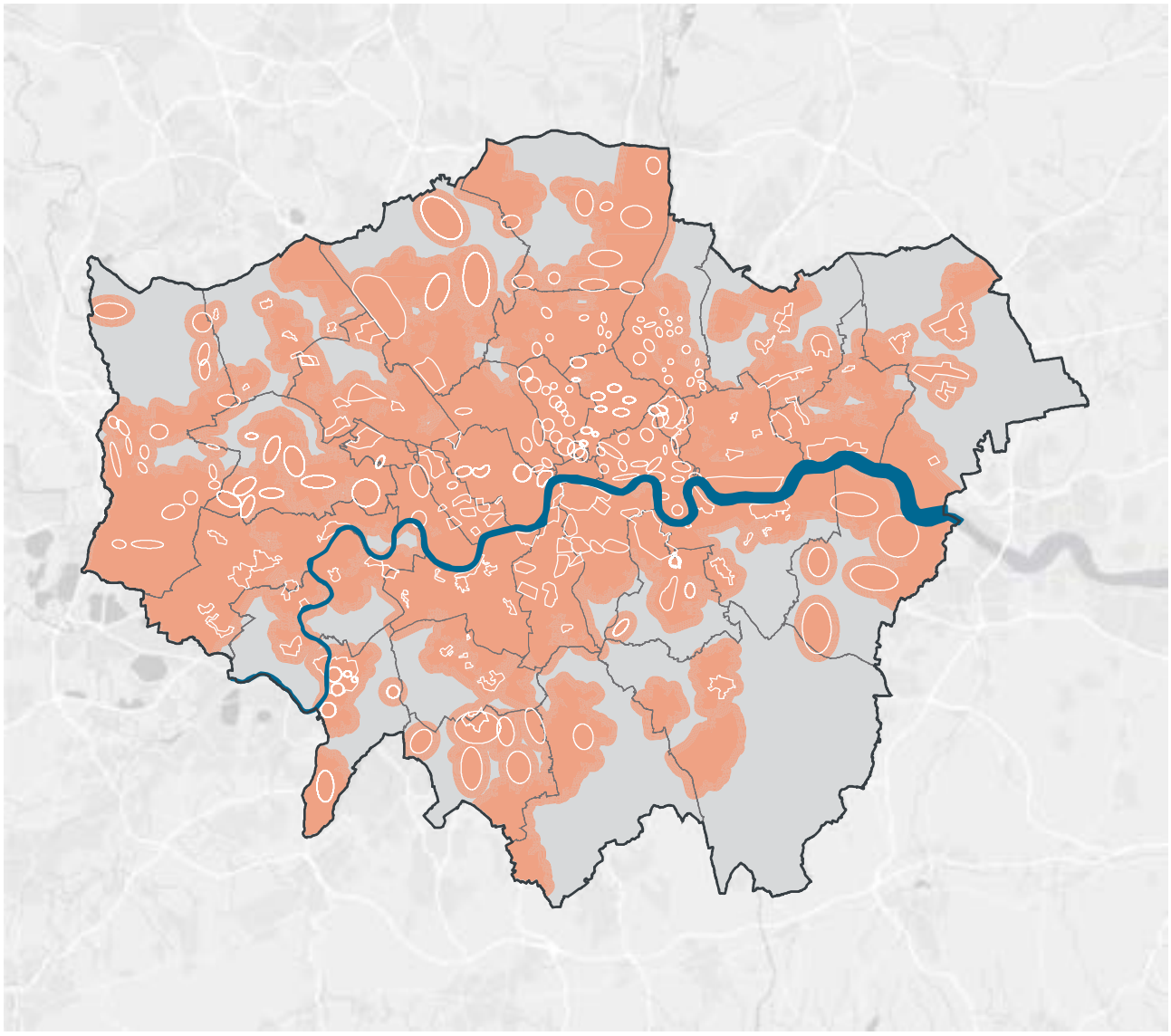
158 London Heat Map, https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map

9.3.5 Where developments are proposed within Heat Network Priority Areas but are beyond existing heat networks, the heating system should be designed to **facilitate cost-effective future connection**. This may include, for example, allocating space in plant rooms for heat exchangers and thermal stores, safeguarding suitable routes for pipework from the site boundary and making provision for connections to the future network at the site boundary. The Mayor is taking a more direct role in the delivery of district-level heat networks so that more new and existing communally-heated developments will be able to connect into them, and has developed a comprehensive decentralised energy support package. Further details are available in the London Environment Strategy.

9.3.6 The Mayor also supports the development of **low-temperature networks** for both new and existing systems as this allows cost-effective use of low-grade waste heat. It is expected that network supply temperatures will drop from the traditional 90°C-95°C to 70°C and less depending on system design and the temperature of available heat sources. Further guidance on designing and operating heat networks will be set out in the updated London Heat Network Manual.

9.3.7 **Low-emission CHP** in this policy refers to those technologies which inherently emit very low levels of NOx. It is not expected that gas engine CHP will fit this category with the technology that is currently available. Further details on circumstances in which it will be appropriate to use low-emission CHP and what additional emissions monitoring will be required will be provided in further guidance. This guidance will be regularly updated to ensure that it reflects changes in technology.

Figure 9.3 - Heat Network Priority Areas



Heat Network Priority Areas

- Heat Network Priority Areas
- Local Authority Heat Network Studies

Source: GLA Environment

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9.3.8 Increasing the amount of **renewable and secondary energy** is supported and development proposals should identify opportunities to maximise both secondary heat sources and renewable energy production on-site. This includes the use of solar photovoltaics, heat pumps and solar thermal, both on buildings and at a larger scale on appropriate sites. There is also potential for wind and hydropower-based renewable energy in some locations within London. Innovative low- and zero-carbon technologies will also be supported.

9.3.9 **Electricity** is essential for the functioning of any modern city. Demand is expected to rise in London in response to a growing population and economy, the increased take up of electric vehicles, and the switch to electric heating systems (such as through heat pumps). It is of concern that the electricity network and substations are at or near to capacity in a number of areas, especially in central London. The Mayor will work with the electricity and heat industry, boroughs and developers to ensure that appropriate infrastructure is in place and integrated within a wider smart energy system designed to meet London's needs.

9.3.10 Demand for **natural gas** in London has been decreasing over the last few years, with a 25 per cent reduction since 2000.[159] This trend is expected to continue due to improved efficiency and a move away from individual gas boilers. Alongside the continuing programme of replacing old metal gas mains (predominantly with plastic piping), local infrastructure improvements may be required to supply energy centres, associated with heat networks, that will support growth in Opportunity Areas and there may also be a requirement for the provision of new pressure reduction stations. These requirements should be identified in energy masterplans.

9.3.11 Cadent Gas and SGN operate London's gas distribution network. Both companies are implementing significant **gasholder de-commissioning programmes**, replacing them with smaller gas pressure reduction stations. The Mayor will work with key stakeholders including the Health and Safety Executive to achieve the release of the resulting brownfield sites for redevelopment including energy infrastructure where appropriate.

9.3.12 Land will be required for energy supply infrastructure including **energy centres**. These centres can capture and store energy as well as generate it. The ability to efficiently store energy as well as to generate it can reduce overall energy consumption, reduce peak demand and integrate greater levels of renewable energy into the energy system.

159 Based on data from London Energy and Greenhouse Gas Inventory (LEGGI) https://data.london.gov.uk/dataset/leggi

Policy SI 4 Managing heat risk

A Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.

B Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure
2) minimise internal heat generation through energy efficient design
3) manage the heat within the building through exposed internal thermal mass and high ceilings
4) provide passive ventilation
5) provide mechanical ventilation
6) provide active cooling systems.

9.4.1 Climate change means London is already experiencing higher than historic average temperatures and more severe hot weather events. This, combined with a growing population, urbanisation and the urban heat island effect, means that **London must manage heat risk** in new developments, using the cooling hierarchy set out above. Whilst the cooling hierarchy applies to major developments, the principles can also be applied to minor development.

9.4.2 In managing heat risk, new developments in London face two challenges – the need to ensure London does not overheat (the urban heat island effect) and the need to ensure that individual buildings do not overheat. **The urban heat island effect** is caused by the extensive built up area absorbing and retaining heat during the day and night leading to parts of London being several degrees warmer than the surrounding area. This can become problematic on the hottest days of the year as daytime temperatures can reach well over 30°C and not drop below 18°C at night. These circumstances can lead many people to feel too hot or not be able to sleep, but for those with certain health conditions, and 'at risk' groups such as some young or elderly Londoners, the effects can be serious

and worsen health conditions. Green infrastructure can provide some mitigation of this effect by shading roof surfaces and through evapotranspiration. Development proposals should incorporate green infrastructure in line with Policy G1 Green infrastructure and Policy G5 Urban greening.

9.4.3 Many aspects of building design can lead to increases in overheating risk, including high proportions of glazing and an increase in the air tightness of buildings. Single-aspect dwellings are more difficult to ventilate naturally and are more likely to overheat, and should normally be avoided in line with Policy D6 Housing quality and standards. There are a number of low-energy measures that can **mitigate overheating risk**. These include solar shading, building orientation and solar-controlled glazing. Occupant behaviour will also have an impact on overheating risk. The Mayor's London Environment Strategy sets out further detail on actions being taken to address this.

9.4.4 Passive ventilation should be prioritised, taking into account external noise and air quality in determining the most appropriate solution. The increased use of **air conditioning systems** is not desirable as these have significant energy requirements and, under conventional operation, expel hot air, thereby adding to the urban heat island effect. If active cooling systems, such as air conditioning systems, are unavoidable, these should be designed to reuse the waste heat they produce. Future district heating networks are expected to be supplied with heat from waste heat sources such as building cooling systems.

9.4.5 The Chartered Institution of Building Services Engineers (CIBSE) has produced **guidance on assessing and mitigating overheating risk in new developments**, which can also be applied to refurbishment projects. TM 59 should be used for domestic developments and TM 52 should be used for non-domestic developments. In addition, TM 49 guidance and datasets should also be used to ensure that all new development is designed for the climate it will experience over its design life. Further information will be provided in guidance on how these documents and datasets should be used.

Policy SI 5 Water infrastructure

A In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner.

B Development Plans should promote improvements to water supply infrastructure to contribute to security of supply. This should be done in a timely, efficient and sustainable manner taking energy consumption into account.

C Development proposals should:

1) through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)

2) achieve at least the BREEAM excellent standard for the 'Wat 01' water category[160] or equivalent (commercial development)

3) incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.

D In terms of water quality, Development Plans should:

1) promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and should take account of Catchment Plans

2) support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Such infrastructure should be constructed in a timely and sustainable manner taking account of new, smart technologies, intensification opportunities on existing sites, and energy implications. Boroughs should work with Thames Water in relation to local wastewater infrastructure requirements.

E Development proposals should:

1) seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided

160 Achieve at least a 12.5% improvement over defined baseline performance standard

2) take action to minimise the potential for misconnections between foul and surface water networks.

F Development Plans and proposals for strategically or locally defined growth locations with particular flood risk constraints or where there is insufficient water infrastructure capacity should be informed by Integrated Water Management Strategies at an early stage.

9.5.1 Londoners consume on average 149 litres of water per person per day – around 8 litres above the national average. All water companies that serve London are located in areas classified as seriously water-stressed. London is at risk of drought after two dry winters. During 2006 and 2012 **water use restrictions** affecting London were imposed. These restrictions were limited to sprinkler, hosepipe and non-essential user bans. A severe drought – with rota cuts, standpipes, reduced mains pressure or adding non-potable water to the mains supply – would have major implications for Londoners' health and wellbeing, the environment and London's economy. The Mayor will work with the water industry to prevent this level of water restriction being required for London in future.

9.5.2 An important aspect of avoiding the most severe water restrictions is to ensure that leakage is reduced and **water used as efficiently as possible**. The Optional Requirement set out in Part G of the Building Regulations should be applied across London.[161] A fittings-based approach should be used to determine the water consumption of a development. This approach is transparent and compatible with developers' procurement and the emerging Water Label,[162] which Government and the water companies serving London are supporting.

9.5.3 Even with increased water efficiency and reduced leakage, water companies are forecasting an increasing demand for water. Without additional sources of supply, the increased demand will increase the risk of requiring water restrictions during drought periods. **Security of supply** should be ensured. Demand forecasts need to continue to be monitored and based on the consistent use of demographic data across spatial and infrastructure planning regimes.

161 Planning Practice Guidance: Paragraph 014 of 'Housing: optional technical standards', DCLG, 27 March 2015. Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations' Optional Requirement of 110 litres per person per day.

162 http://www.europeanwaterlabel.eu/thelabel.asp

9.5.4 Thames Water has set out through the water resource management planning process its preferred approach to **strategic water supply options** to serve London and parts of the Wider South East. It is considering a suite of options, including a potential new reservoir, effluent reuse, water transfers and new groundwater sources.

9.5.5 A strategic approach to water supply networks to ensure future water resilience and, in particular, the timely planning for a new strategic water resource to serve London and the Wider South East is important. In its draft Water Resource Management Plan, Thames Water has explored coordinated supply options with the other water companies serving London and the South East of England working with the Water Resource South East Group. Water Resource East has undertaken similar work in the East of England area. All this involves **partnership working** with key stakeholders within London and beyond its boundaries.

9.5.6 **Infrastructure investment** is constrained by the short-term nature of water companies' investment plans. Similar to the approach to electricity supply, in order to facilitate the delivery of development it is important that investment in water supply infrastructure is provided ahead of need. To minimise wastage, water supply infrastructure improvements should give consideration to the replacement of ageing trunk mains.

9.5.7 In the context of the significant investment needed, measures to **protect and support vulnerable customers** in particular from rising water bills are important.

9.5.8 In relation to **wastewater** and improvements to the water environment, Water Framework Directive requirements should be maintained through the Thames River Basin Management Plan and the Catchment Plans prepared by the Catchment Partnerships, of which there are 12 in London. These Partnerships share lessons, experiences and best practice, and help achieve a coordinated approach to delivering the Thames River Basin Management Plan. Development Plans should be supported by evidence, which demonstrates that the development planned for:

a. will not compromise the Thames River Basin Management Plan objective of achieving 'Good' status, or cause deterioration in water quality; and

b. will be supported by adequate and timely provision of wastewater treatment infrastructure.

9.5.9 The Urban Wastewater Treatment Directive drives improvements in **wastewater treatment infrastructure**. Figure 9.4 provides a spatial illustration of the wastewater drainage capacity across London. Additional land may be required for upgrades or improvements at some wastewater treatment plants during the Plan period. Different wastewater treatment options may vary significantly in

terms of their energy requirements, and there are significant opportunities for energy generation from wastewater treatment (sewage sludge).

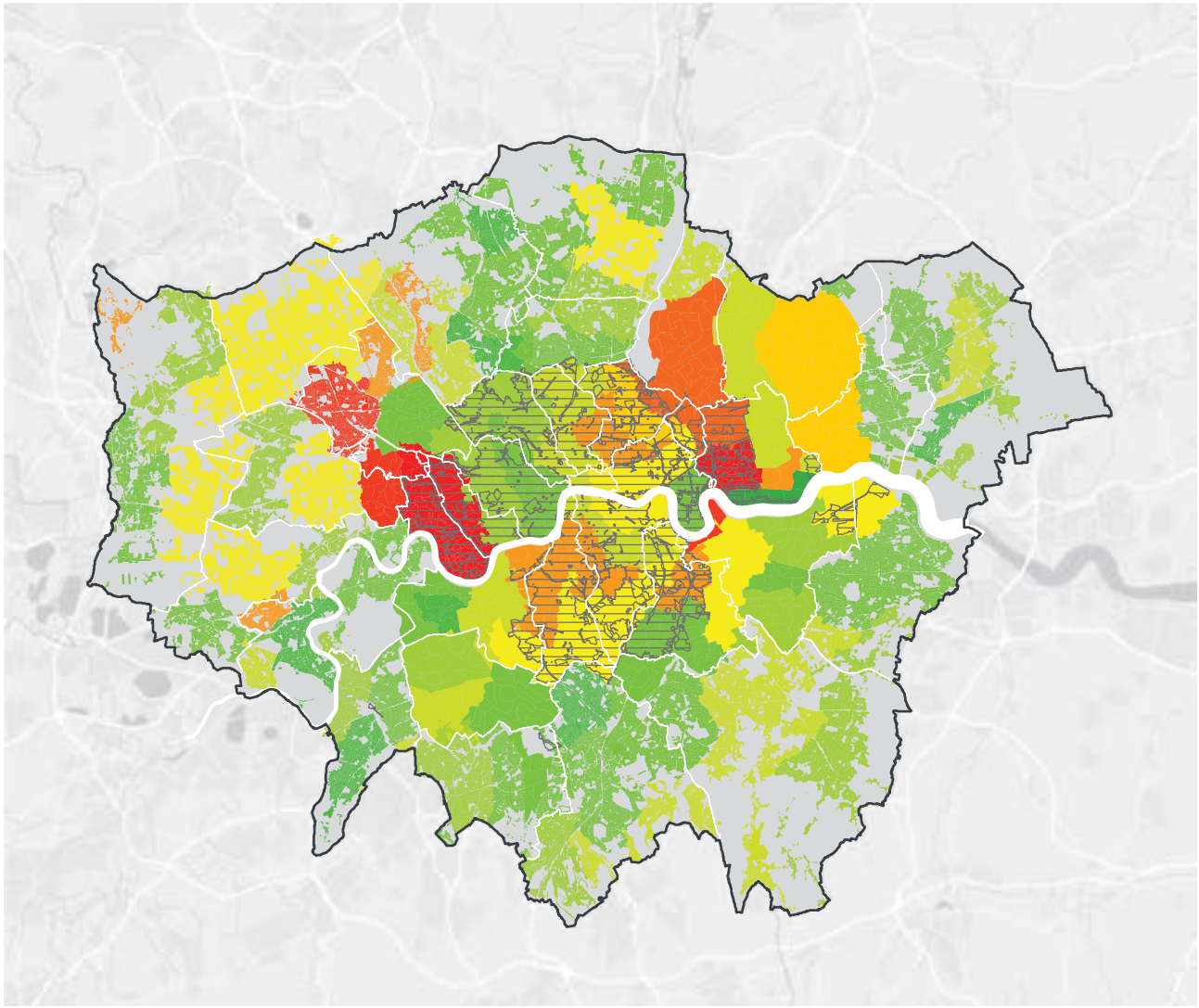
9.5.10 The Thames Tideway Tunnel is under construction and will help to improve the water quality of the River Thames by significantly reducing the frequency of untreated sewage being discharged into the Thames (known as combined sewer overflows). **Sustainable drainage** measures are of particular importance in areas with sewer capacity limitations and their widespread implementation over the coming decades will help the resilience of London and avoid the need for further major sewer tunnel projects. Thames Water is taking a long-term approach to drainage and wastewater management planning. Its London 2100 plan will identify the most appropriate strategy for ensuring that London's drainage and wastewater systems can meet the needs of London over the next 80 years in the most sustainable way.

9.5.11 London's tributary rivers suffer significant pollution from **misconnected sewers**. This allows untreated sewage into what are often small streams, many of which flow through London's parks and open spaces. Conversely, if surface water is misconnected to the foul system, sewer capacity issues are created within sewers and at sewage treatment works. Development proposals should therefore take action to minimise the potential for misconnections.

9.5.12 Development Plans and proposals should demonstrate that they have considered the opportunities for **integrated solutions** to water-related constraints and the provision of water infrastructure within strategically or locally defined growth locations. These could be Opportunity Areas or growth locations defined in Local Plans. Where such opportunities are identified, Development Plans should require an integrated and collaborative approach from developers. This could for example lead to the establishment of local water reuse systems or integrated drainage networks. Integration with the planning of green infrastructure could deliver further benefits.

9.5.13 A **water advisory group** with representatives from across the water sectors in London has been established to advise the Mayor and share information on strategic water and flood risk management issues across the capital.

Figure 9.4 - Spatial illustration of wastewater drainage capacity across London



Flow Capacity Utilisation 2015
Percent

- 14
- 15 - 20
- 21 - 30
- 31 - 40
- 41 - 50
- 51 - 60
- 61 - 70
- 71 - 80
- 81 - 90
- 91 - 100
- 101 - 123
- Combined Sewer System

Source: Thames Water

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This Figure must be used in conjunction with paragraph 9.5.14

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Note for Figure 9.4: Thames Water has developed a model of its drains and sewers in London to assess waste water flows. The model compares the theoretical capacity of the drain or sewer pipe against how much waste water flow the pipe is currently receiving during a one in two-year rainfall event. The model's outputs can be visualised as a 'heat map', which highlights at a strategic scale where there is a higher (green) or lower (red) ability to receive additional flows. 'Green' areas do not mean that no additional drainage infrastructure is required. The modelling does not consider how waste water is routed through the network, so it should be noted that some 'green' areas will flow into 'red' areas, hence increasing flows upstream will exacerbate performance in the downstream catchments. The hatched area on the map shows the portions of the sewer system that are generally combined sewers, which means they capture both waste water and surface water flows.

Policy SI 6 Digital connectivity infrastructure

A To ensure London's global competitiveness now and in the future, development proposals should:

1) ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users
2) meet expected demand for mobile connectivity generated by the development
3) take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation
4) support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

B Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.

9.6.1 The **provision of digital infrastructure** is as important for the proper functioning of development as energy, water and waste management services and should be treated with the same importance. London should

be a world-leading tech hub with world-class digital connectivity that can anticipate growing capacity needs and serve hard to reach areas. Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative companies. It supports every aspect of how people work and take part in modern society, helps smart innovation and facilitates regeneration.

9.6.2 **London's capability** in this area is currently limited by a range of issues, including the availability of fibre and the speeds delivered. The industry regulator Ofcom publishes the data on digital connectivity coverage on which Figure 9.5 is based, but there are some limitations to the practicality of the data that is collected. Further work will be done to accurately identify locations in the capital where current connectivity provisions are not suitable for the needs of the area.

9.6.3 **Better digital connectivity** with a focus on capability, affordability, security, resilience and the provision of appropriate electrical power supply should be promoted across the capital. The specific requirements of business clusters, such as a symmetrical-capable service with the same upload and download speeds, should also be met.

9.6.4 Given the fast pace at which digital technology is changing, a flexible approach to development is needed that supports **innovation and choice**. Part R1 of the Building Regulations 2010 requires buildings to be equipped with at least 30 MB/s ready in-building physical infrastructure, however new developments using full fibre to the property or other higher-grade infrastructure can achieve connectivity speeds of 1GB/s. Developers should engage early with a range of network operators, to ensure that development proposals are designed to be capable of providing this level of connectivity to all end users. Mechanisms should also be put in place to enable further future infrastructure upgrades. Innovation is driving reductions in the size of infrastructure, with marginal additional unit costs, but greater digital connectivity is needed in more locations.

9.6.5 Development proposals should also demonstrate that **mobile connectivity** will be available throughout the development and should not have detrimental impacts on the digital connectivity of neighbouring buildings. Early consultation with network operators will help to identify any adverse impact on mobile or wireless connectivity and appropriate measures to avoid/mitigate them.

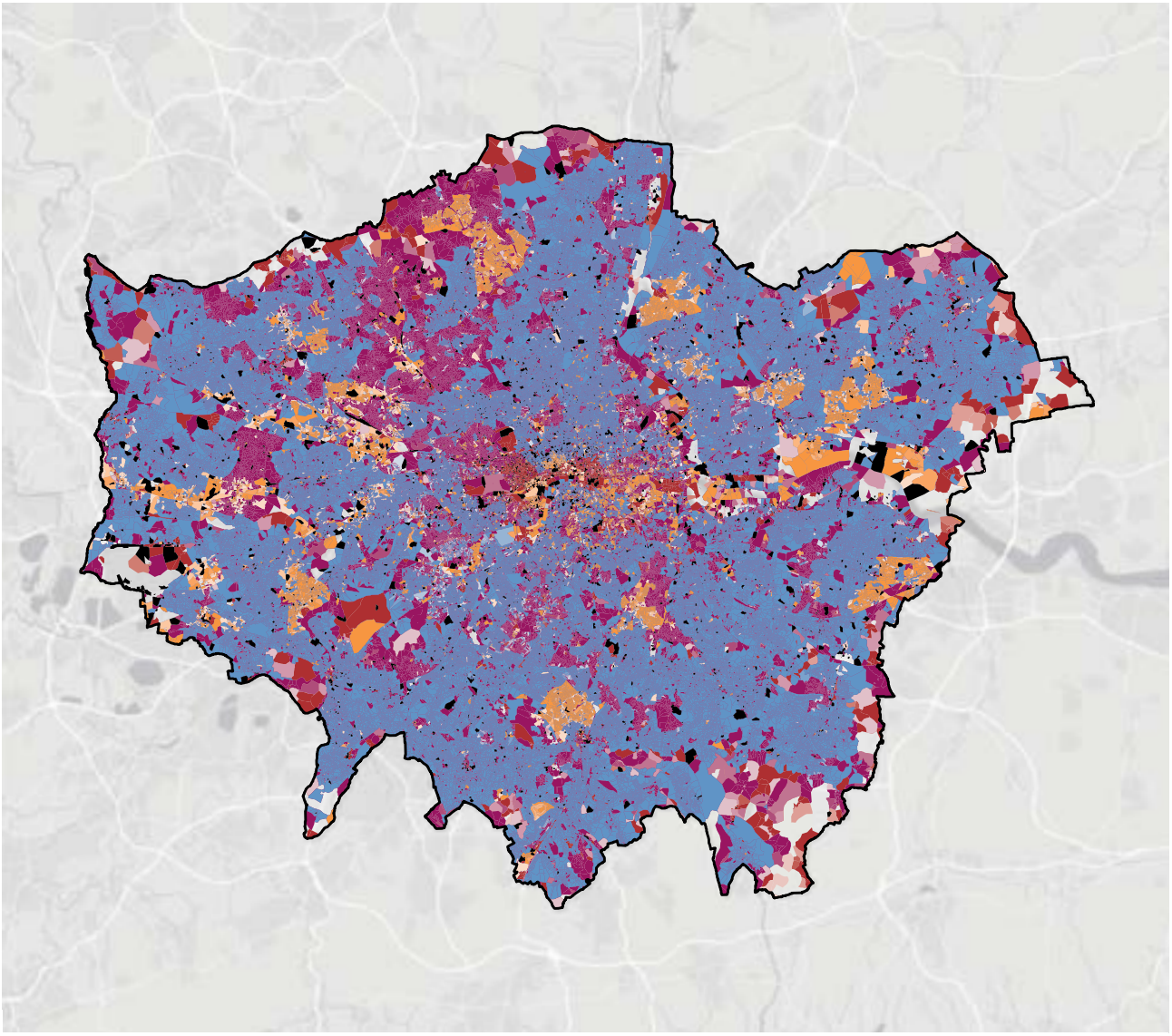
9.6.6 Access for network operators to rooftops of new developments should be supported where an improvement to the mobile connectivity of the area can be identified. Where possible, other opportunities to secure **mobile connectivity improvements** should also be sought through new developments, including for example the creative use of the public realm.

9.6.7 For some types of development (such as commercial) specific requirements regarding **communications access and security** may apply. Data centres, in particular, depend on reliable connectivity and electricity infrastructure. Warehouse-based data centres have emerged as a driver of industrial demand in London over recent years and this will need to be taken into account when assessing demand for industrial land (see Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution).

9.6.8 The Mayor will work with network operators, developers, councils and Government to develop guidance and share good practice to **increase awareness and capability** amongst boroughs and developers of the effective provision of digital connectivity and to support the delivery of policy requirements. The Mayor will also help to identify spatial gaps in connectivity and overcome barriers to delivery to address this form of digital exclusion, in particular through his Connected London work. Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their Development Plans.

9.6.9 Digital connectivity supports **smart technologies** in terms of the collection, analysis and sharing of data on the performance of the built and natural environment, including for example, water and energy consumption, waste, air quality, noise and congestion. Development should be fitted with smart infrastructure, such as sensors, to enable better collection and monitoring of such data. As digital connectivity and the capability of these sensors improves, and their cost falls, more and better data will become available to improve monitoring of planning agreements and impact assessments, for example related to urban design. Further guidance will be developed to make London a smarter city.

Figure 9.5 - Broadband coverage May 2019



Broadband coverage as of May 2019

Availability (% Premises)

Full Fibre	Ultra-fast Broadband	Super-fast Broadband	30Mbit/s Unavailability
1 - 20	1 - 20	1 - 20	1 - 20
21 - 40	21 - 40	21 - 40	21 - 40
41 - 60	41 - 60	41 - 60	41 - 60
61 - 80	61 - 80	61 - 80	61 - 80
81 - 100	81 - 100	81 - 100	81 - 100
			No Data Available (Postcode areas)

Source: Ofcom

Contains OS data © Crown copyright and database right (2019)

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Note for Figure 9.5: For the most up to date broadband coverage and information on broadband connection types please see https://www.london.gov.uk/what-we-do/business-and-economy/supporting-londons-sectors/connectivity

Policy SI 7 Reducing waste and supporting the circular economy

A Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

1) promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible
2) encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products
3) ensure that there is zero biodegradable or recyclable waste to landfill by 2026
4) meet or exceed the municipal waste recycling target of 65 per cent by 2030[163]
5) meet or exceed the targets for each of the following waste and material streams:
    a) construction and demolition – 95 per cent reuse/recycling/recovery
    b) excavation – 95 per cent beneficial use[164]
6) design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

163 Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes business waste collected by local authorities and by the private sector.

164 All inert excavation waste should be used for beneficial uses.

B Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

1) how all materials arising from demolition and remediation works will be re-used and/or recycled
2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
3) opportunities for managing as much waste as possible on site
4) adequate and easily accessible storage space and collection systems to support recycling and re-use
5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
6) how performance will be monitored and reported.

C Development Plans that apply circular economy principles and set local lower thresholds for the application of Circular Economy Statements for development proposals are supported.

9.7.1 Waste is defined as anything that is discarded. A **circular economy** is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. London should move to a more circular economy as this will save resources, increase the resource efficiency of London's businesses, and help to reduce carbon emissions. The successful implementation of circular economy principles will help to reduce the volume of waste that London produces and has to manage. A key way of achieving this will be through incorporating circular economy principles into the design of developments (see also Policy D3 Optimising site capacity through the design-led approach) as well as through Circular Economy Statements for referable applications.

9.7.2 The adoption of circular economy principles for referable applications means creating a built environment where buildings are designed for **adaptation, reconstruction and deconstruction**. This is to extend the useful life of buildings and allow for the salvage of components and materials for reuse or recycling. Un-used or discarded materials should be brought back to an equal or

comparable level of quality and value and reprocessed for their original purpose (e.g. recycling glass back into glass, instead of into aggregate).

9.7.3 To assist with the introduction of Circular Economy principles, the Mayor will be providing further guidance on **Circular Economy Statements**. Circular Economy Statements are intended to cover the whole life cycle of development. This will apply to referable schemes and be encouraged for other major infrastructure projects within London. Boroughs are encouraged to set lower local thresholds through Development Plans.

9.7.4 In 2015[165] London produced just under 18 million tonnes (mt) of **waste**, comprising:

- 3.1mt household waste – 17 per cent
- 5.0mt commercial/industrial waste – 28 per cent
- 9.7mt construction, demolition and excavation waste – 54 per cent

9.7.5 Modelling[166] suggests that if London achieves the Mayor's reduction and recycling targets, it will have sufficient **Energy from Waste** capacity to manage London's non-recyclable municipal waste, once the new Edmonton and Beddington Lane facilities are operational.

9.7.6 The London Environment Strategy sets out a pathway to achieving a municipal recycling target of 65 per cent by 2030 and outlines the Mayor's approach to **municipal waste** management in detail. This includes London achieving a 50 per cent reduction in food waste and associated packaging waste per person by 2030, and London local authorities needing to provide a minimum level of recycling service, including separate food waste, to residents by 2020. To achieve these recycling targets, it will be important that recycling, storage and collection systems in new developments are appropriately designed. Further detail on how developments should do this is set out in guidance.

9.7.7 Re-use and recycling rates for **construction, demolition and excavation waste** and material (CD&E) in London is estimated between 50 – 60 per cent[167] for 2015 with some large construction projects including the Olympic Park achieving 85 – 95 per cent recovery rates. The targets for CD&E waste and material are already

165 https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports

166 See objective 7.4 London Environment Strategy, May 2018

167 Based on CD&E waste data interrogator data 2015. Estimate only as actual CD&E waste performance data is not available and not a requirement to report. Actual performance likely to be higher as waste reused or recycled on- site is not reported through the waste data interrogator.

being set on some projects, but better data (particularly relating to reuse on site) is needed to inform performance. The adoption of circular economy principles in referable applications (and promoted in Local Plans) is expected to help London achieve the CD&E waste and material recovery targets early in the Plan period.

9.7.8 The movement and management of household, commercial and industrial, and construction, demolition and excavation waste will be monitored in collaboration with other stakeholders through available data sets (including the Environment Agency's Waste Data Interrogator tool and WasteDataFlow) and reporting against commitments in Circular Economy Statements. This will inform reporting on and **monitoring** of the achievement of the targets set out in this policy, Part A.

9.7.9 Part A4 reflects recent **changes to the regulatory regime** that mean that the particular characteristics of excavation waste make it difficult to recover. The Mayor will continue to work with stakeholders to understand the implications of this regulatory change and to promote its beneficial use and limit the amount sent to landfill. The best environmental option practicable for the management of excavation material should be used. This could, for example, include using the material as a resource within the construction of the proposed development, or in other local construction projects, or using the material in habitat creation, flood defences or landfill restoration. In line with circular economy principles, the management of excavation waste should be focused on-site or within local projects.

9.7.10 When it is intended to send **waste to landfill** it will be important to show evidence that the receiving facility has the capacity to deal with waste over the lifetime of the development. This information should be made available to the relevant waste planning authority to help plan for future needs.

Policy SI 8 Waste capacity and net waste self-sufficiency

A In order to manage London's waste sustainably:

1) the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026
2) existing waste management sites should be safeguarded (see Policy SI 9 Safeguarded waste sites)
3) the waste management capacity of existing sites should be optimised
4) new waste management sites should be provided where required
5) environmental, social and economic benefits from waste and secondary materials management should be created.

B Development Plans should:

1) plan for identified waste needs
2) identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantums of waste will be managed
3) allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 – boroughs are encouraged to collaborate by pooling their apportionment requirements
4) identify the following as suitable locations to manage borough waste apportionments:
    a) existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity
    b) Strategic Industrial Locations and Locally Significant Industrial Sites
    c) safeguarded wharves with an existing or future potential for waste and secondary material management.

C Mayoral Development Corporations must cooperate with host boroughs to meet identified waste needs.

D Development proposals for materials and waste management sites are encouraged where they:

1) deliver a range of complementary waste management and secondary material processing facilities on a single site

2) support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets

3) contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste, and/or

4) are linked to low emission combined heat and power and/or combined cooling heat and power (CHP is only acceptable where it will enable the delivery or extension of an area-wide heat network consistent with Policy SI 3 Energy infrastructure Part D1c)

E Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:

1) the nature of the activity, its scale and location

2) effective implementation of the waste hierarchy and its contribution to London's circular economy

3) achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings – all facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum performance of 400g of CO_2 equivalent per kilowatt hour of electricity produced

4) the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) – where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed

5) the transport and environmental impacts of all vehicle movements related to the proposal – the use of renewable fuels from waste sources and the use of rail and waterway networks to transport waste should be supported.

F When planning for new waste sites or to increase the capacity at existing sites the following should be considered:

1) job creation and social value benefits, including skills, training and apprenticeship opportunities

2) local need

3) accessibility of services for local communities and businesses.

Table 9.1 - Forecast arisings of household, commercial and industrial waste by borough 2021-2041 (000's tonnes)

Borough	2021	2041
Barking & Dagenham	214	230
Barnet	315	340
Bexley	225	241
Brent	259	274
Bromley	249	267
Camden	360	374
City of London	230	238
Croydon	305	327
Ealing	291	306
Enfield	305	327
Greenwich	209	226
Hackney	183	195
Hammersmith & Fulham	183	190
Haringey	190	201
Harrow	188	205
Havering	229	249
Hillingdon	347	365
Hounslow	260	275
Islington	241	251
Kensington & Chelsea	201	210
Kingston	152	160
Lambeth	208	219
Lewisham	191	206
Merton	174	184
Newham	244	260
Redbridge	196	216
Richmond	179	190
Southwark	292	308
Sutton	161	172
Tower Hamlets	260	273
Waltham Forest	202	218
Wandsworth	251	264
City of Westminster	722	749
London total	**8,217**	**8,726**

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Table 9.2 - Borough-level apportionments of household, commercial and industrial waste 2021-2041 (000's tonnes)

Borough	Apportionment *	2021	2041
Barking & Dagenham	6.1	505	537
Barnet	2.6	215	229
Bexley	5.6	457	485
Brent	5.0	412	437
Bromley	2.3	192	204
Camden	1.6	133	141
City of London	1.0	84	90
Croydon	3.1	252	268
Ealing	6.6	542	576
Enfield	4.3	356	379
Greenwich	4.1	338	359
Hackney	1.3	111	118
Hammersmith & Fulham	2.6	210	223
Haringey	2.3	192	203
Harrow	1.9	160	170
Havering	4.5	370	393
Hillingdon	5.1	423	449
Hounslow	5.0	407	432
Islington	1.2	101	108
Kensington & Chelsea	1.4	116	123
Kingston	2.3	187	199
Lambeth	1.7	143	152
Lewisham	2.2	184	195
Merton	2.9	238	253
Newham	4.7	383	407
Redbridge	1.8	151	160
Richmond	1.8	148	157
Southwark	1.8	150	159
Sutton	2.6	211	224
Tower Hamlets	2.4	195	207
Waltham Forest	2.4	199	211
Wandsworth	3.2	264	280
City of Westminster	2.3	188	200
London total	**100.0**	**8,217**	**8,726**

* Apportionment is per cent share of London's total waste to be managed by borough

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Table 9.3 - Projected net exports of household, commercial and industrial waste from London (000's tonnes)

Type	2015	2021	2026	2041
London's arisings	8,100	8,216	8,299	8,726
London's exports	3,449	1,725	0	0

Note: 2015 is an actual figure (SLR May 2017), data for 2021, 2026 and 2041 are projections

9.8.1 In 2015, London managed 7.5mt of its own waste and exported 11.4mt of waste. London also imported 3.6mt of waste. This gives London a current waste **net self-sufficiency figure** of approximately 60 per cent. Around 5mt (49 per cent) of waste exported from London went to the East of England and 4.2mt (42 per cent) to the South East. The bulk of this waste is CD&E waste. Approximately 1.3mt of waste was exported overseas. The term net self-sufficiency is meant to apply to all waste streams, with the exception of excavation waste. The particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision needed to apply net self-sufficiency to this waste stream.

9.8.2 In 2015, 2.9mt of the waste sent to the East of England went to landfill and 2.2mt went to landfill in the South East. Some 32 per cent of London's waste that was biodegradable or recyclable was sent to landfill. The Mayor is committed to **sending zero biodegradable or recyclable waste to landfill by 2026**.

9.8.3 Waste contracts do not recognise administrative boundaries and waste flows across borders. Therefore, sufficient sites should be identified within London to deal with the equivalent of 100 per cent of the waste apportioned to the boroughs as set out in Table 9.2. The Mayor will work with boroughs, the London Waste and Recycling Board, and the London and neighbouring Regional Technical Advisory Bodies to address **cross-boundary waste flow issues**. Examples of joint working include ongoing updates to the London Waste Map, sharing data derived from Circular Economy Statements, the monitoring of primary waste streams and progress to net self-sufficiency, supporting the Environment Agency's annual monitoring work, and collaboration on management solutions of waste arisings from London.

9.8.4 Waste is deemed to be managed in London if any of the following activities take place within London:

- waste is used for energy recovery

- the production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum[168] which is destined for energy recovery
- it is sorted or bulked for re-use (including repair and re-manufacture) or for recycling (including anaerobic digestion)
- It is reused or recycled (including anaerobic digestion).

9.8.5 Supporting the production of **SRF and high-quality RDF feedstock** will promote local energy generation and benefit Londoners, improving London's energy security, helping to achieve regional self-sufficiency and possibly reducing leakage of SRF and RDF overseas. London facilities should produce high-quality waste feedstock with very little recyclable content (i.e. plastics), supporting renewable energy generation.

9.8.6 Table 9.1 shows projected arisings for household, commercial and industrial waste for each borough. National policy guidance requires boroughs to have regard to the **waste apportionments** set out in the London Plan. The Plan's waste apportionment model defines the proportion of London's total household, commercial and industrial waste that each borough should plan for, and these apportionments are set out in Table 9.2. Part B3 requires boroughs to allocate sufficient land (sites and/or areas) and identify waste management facilities to provide the capacity to manage their apportioned tonnages of waste. Boroughs are encouraged to collaborate by pooling their apportionment requirements. Boroughs with a surplus of waste sites should offer to share these sites with those boroughs facing a shortfall in capacity before considering site release.

9.8.7 Boroughs should examine in detail **how capacity can be delivered at the local level** and demonstrate how this can be provided for through the allocation of sufficient sites and the identification of suitable areas in Development Plans to meet their apportionment, and should aim to meet their waste apportionment as a minimum. It may not always be possible for boroughs to meet their apportionment within their boundaries and in such circumstances boroughs will need to agree the transfer of apportioned waste. Where apportionments are pooled, boroughs must demonstrate how their joint apportionment targets will be met, for example through joint waste Development Plan Documents, joint evidence papers or bilateral agreements.

9.8.8 **Mayoral Development Corporations** (MDCs) must cooperate with host boroughs to meet identified waste needs; this includes boroughs'

168 See http://www.sita.co.uk/services-and-products/our-products/rdf-srf for an explanation of the differences between SRF and RDF.

apportionment requirements. This could be widened to cover boroughs in the relevant waste planning group where appropriate. In future iterations of the Plan full consideration will be given to apportioning waste needs to MDCs.

9.8.9 Waste planning authorities and groups should plan to meet the identified waste management needs of their local area and are encouraged to identify suitable **additional capacity for waste**, including those waste streams not apportioned by the London Plan, where practicable. This could include, waste transfer sites, new sites managing construction, demolition and excavation waste, or the reconfiguration and intensification of existing uses that increase management capacity.

9.8.10 Plans or agreements **safeguarding waste sites** should take a flexible approach. They should be regularly reviewed and updated to take account of development that may lead to the integration of waste sites or appropriate relocation of lost waste sites. Waste plans should be responsive to strategic opportunities across borough and joint waste planning boundaries for optimising capacity on existing waste sites, or that help to unlock investment in developing new waste sites. Where a waste site may be lost, compensatory capacity should first be explored within the borough. In cases where this can't be provided, and suitable capacity is found in another borough, the receiving borough or joint waste planning group is encouraged to take on the apportionment and include it as part of their Development Plan.

9.8.11 Land in Strategic Industrial Locations will provide the main opportunities for locating waste treatment facilities. Existing waste management sites should be clearly identified and safeguarded for waste use. Boroughs should also look to Locally Significant Industrial Sites and intensification of existing waste management sites. Large-scale redevelopment opportunities and redevelopment proposals should incorporate waste management facilities within them. The London Waste Map[169] shows the locations of London's permitted waste facilities and sites that may be suitable for waste facility location.

9.8.12 As noted above, waste flows across boundaries and London exported 3.4mt of household, commercial and industrial waste in 2015. To meet the Mayor's policy commitment of net self-sufficiency by 2026 there needs to be a reduction in exports or an increase in imports in the lead up to 2026. Table 9.3 is included to help neighbouring authorities plan for London's expected household, commercial and industrial waste exports.

169 London Waste Map, https://maps.london.gov.uk/webmaps/waste/

9.8.13 Tables 9.1, 9.2 and 9.3 only refer to household, commercial and industrial waste, not construction, demolition and excavation waste. As the **reliability of CD&E waste data is low**, apportionments for this waste stream are not set out. For a fuller discussion of the issues around CD&E waste data see paragraph 9.7.7 and the SLR consulting report (task 2) (May 2017).

9.8.14 To support the shift towards a low-carbon circular economy, all facilities generating energy from waste should meet, or demonstrate that they can meet in future, a measure of minimum greenhouse gas performance known as the **carbon intensity floor** (CIF). The CIF is set at 400g of CO_2 equivalent generated per kilowatt hour (kwh) of electricity generated. The GLA's free on-line ready reckoner tool can assist boroughs and applicants in measuring and determining performance against the CIF.[170] Achieving the CIF effectively rules out traditional mass burn incineration techniques generating electricity only. Instead, it supports techniques where both heat and power generated are used, and technologies are able to achieve high efficiencies, such as when linked with gas engines and hydrogen fuel cells. More information on how the CIF has been developed and how to meet it can be found in the London Environment Strategy.

9.8.15 Waste to energy facilities should be equipped with a **heat off-take** from the outset such that a future heat demand can be supplied without the need to modify the heat producing plant in any way or entail its unplanned shut-down. It should be demonstrated that capacity of the heat off-take meets the CIF at 100 per cent heat supply. In order to ensure it remains relevant, the CIF level will be kept under review.

9.8.16 Examples of the '**demonstrable steps**' required under Part E3 are:

- a commitment to source truly residual waste – waste with as little recyclable material as possible
- a commitment (via a Section 106 obligation) to deliver the necessary means for infrastructure to meet the minimum CO_2 standard, for example investment in the development of a heat distribution network to the site boundary, or technology modifications that improve plant efficiency
- an agreed timeframe (via a Section 106 agreement) as to when proposed measures will be delivered
- the establishment of a working group to progress the agreed steps and monitor and report performance to the consenting authority.

170 https://www.london.gov.uk/what-we-do/environment/waste-and-recycling/waste-policy

9.8.17 To assist in the delivery of 'demonstrable steps' the GLA can help to advise on **heat take-off opportunities** for waste to energy projects, particularly where these are linked to GLA supported energy masterplans.

9.8.18 In 2015 around 324,000 tonnes of **hazardous waste** was produced in London. Hazardous waste makes up a component of all waste streams and is included in the apportionments for household, commercial and industrial waste set out in Table 9.2. London sends small amounts of hazardous waste to landfill outside of London, approximately three per cent of the national total. The amount of such waste produced has continued to grow in the short and medium term. Without sustained action, there remains the risk of a major shortfall in our capacity to treat and dispose of hazardous waste safely. This could lead to storage problems, illegal disposal (including fly tipping) and rising public concern about health and environmental impacts. There is therefore a need to continue to identify hazardous waste capacity for London. The main requirement is for sites for regional facilities to be identified. Boroughs will need to work with neighbouring authorities to consider the necessary facilities when planning for their hazardous waste.

9.8.19 **Waste processing facilities** should be well designed. They should respect context, not be visually overbearing and should contribute to the local economy as a source of new products and new jobs. They should be developed and designed in consultation with local communities, taking account of health and safety within the facility, the site and adjoining neighbourhoods. Developments supporting circular economy outcomes such as re-use, repair and re-manufacture, will be encouraged. Where movement of waste is required, priority should be given to facilities for movement by river or rail. Opportunities for combined heat, power and cooling should be taken wherever possible. Although no further landfill proposals in London are identified or anticipated within the Plan period, if proposals do come forward for new or extended landfill capacity or for land-raising, boroughs should ensure that the resultant void-space has regard to the London Environment Strategy.

9.8.20 Following the Agent of Change principle, developments adjacent to waste management sites should be designed to **minimise the potential for disturbance and conflicts of use**. Developers should refer to the London Waste and Recycling Board's design guide for ensuring adequate and easily accessible storage space for high-rise developments, see Part E of Policy D6 Housing quality and standards.

Policy SI 9 Safeguarded waste sites

A Existing waste sites should be safeguarded and retained in waste management use.

B Waste facilities located in areas identified for non-waste related development should be integrated with other uses as a first principle where they deliver clear local benefits.

C Waste plans should be adopted before considering the loss of waste sites. The proposed loss of an existing waste site will only be supported where appropriate compensatory capacity is made within London that must be at or above the same level of the waste hierarchy and at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.

D Development proposals that would result in the loss of existing sites for the treatment and/or disposal of hazardous waste should not be permitted unless compensatory hazardous waste site provision has been secured in accordance with this policy.

E Development proposals for the relocation of waste sites within London are supported where strategic waste management outcomes are achieved.

9.9.1 London has approximately 500 **waste sites**, defined as land with planning permission for a waste use or a permit from the Environment Agency for a waste use. This applies to land used for any waste stream. These sites cover a wide range of waste activities and perform a valuable service to London, its people and economy.

9.9.2 Any **proposed release of current waste sites** or those identified for future waste management capacity should be part of a plan-led process, rather than done on an ad-hoc basis. Waste sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used; where this is not available potential capacity of the site should be appropriately assessed.

9.9.3 Policy SI 8 Waste capacity and net waste self-sufficiency promotes **capacity increases at waste sites** where appropriate to maximise their use. If such increases are implemented over the Plan period, it may be possible to justify the

release of waste sites if it can be demonstrated that there is sufficient capacity available elsewhere in London at appropriate sites over the Plan period to meet apportionment and that the target of achieving net self-sufficiency is not compromised. In such cases, sites could be released for other land uses.

Policy SI 10 Aggregates

A An adequate supply of aggregates to support construction in London will be achieved by:

1) encouraging re-use and recycling of construction, demolition and excavation waste within London, including on-site
2) extracting land-won aggregates within London
3) importing aggregates to London by sustainable transport modes.

B Development Plans should:

1) make provision for the maintenance of a landbank (i.e. seven years' supply) of at least five million tonnes of land-won aggregates up to 2041, in particular through a landbank apportionment of:
    a) at least 1.75 mt to London Borough of Havering
    b) at least 0.7 mt to London Borough of Redbridge
    c) at least 1.75 mt to London Borough of Hillingdon
    d) at least 0.7 mt to London Borough of Hounslow.
2) ensure sufficient capacity of aggregates wharves and aggregate rail depots is available to ensure a steady and adequate supply of imported and marine aggregates to London and maximise the movement of aggregates by sustainable modes
3) support the production of recycled/secondary aggregates and, where practicable, expand capacity at/or adjacent to aggregates wharves and rail depots and quarries during their operational life, within or adjacent to major construction projects.

C All Mineral Planning Authorities should, in Development Plans:

1) identify mineral safeguarding areas to protect sand and gravel resources from development that would otherwise sterilise future potential extraction

2) identify and safeguard sites and facilities, including wharves and railheads, with existing, planned or potential capacity for transportation, distribution, processing and/or production of primary and/or secondary/ recycled aggregates.

D To reduce the environmental impact of aggregate sites and facilities development proposals should:

1) demonstrate that appropriate measures to deal with aftercare, restoration and re-use of minerals sites following extraction are in place; with particular emphasis on promoting green infrastructure and biodiversity

2) ensure that potential impacts, in particular to the natural and historic environment and to human health, are assessed and effectively controlled.

E Development proposals should be designed to avoid and mitigate potential conflicts with sites safeguarded for the transportation, distribution, processing and/or production of aggregates, in line with the Agent of Change principle.

9.10.1 London needs a **reliable supply of construction materials** to support continued growth. National planning policy requires Mineral Planning Authorities to maintain a steady and adequate supply of aggregates. These include land-won sand and gravel, crushed rock, marine sand and gravel, recycled materials and secondary aggregates created from construction, demolition and excavation (CD&E) and industrial waste. Most aggregates used in the capital come from outside London, including marine sand and gravel and land-won aggregates, principally crushed rock from other regions. There are relatively small resources of workable land-won sand and gravel in London.

9.10.2 A realistic **landbank** (i.e. seven years' supply) of at least 5 million tonnes of land-won aggregates for London throughout the Plan period has been apportioned to boroughs as set out in this policy. There remains some potential for extraction beyond the four boroughs identified, including within the Lee Valley. Boroughs with aggregates resources should consider extraction opportunities when preparing Development Plans.

9.10.3 Those boroughs with an apportionment should plan to meet their landbank target and plan for the steady and adequate supply of **minerals** through the

identification of specific sites where viable resources are known to exist, preferred areas where known resources are likely to get planning permission, and areas of search where mineral resources might reasonably be anticipated.

9.10.4 Aggregates are bulky materials so Development Plans should maximise their use and re-use and minimise their movement, especially by road. The objective of proximity dictates that the best option is the use of local materials where feasible. The **re-use/recycling** of building materials and aggregates is a significant and well established component of the circular economy advocated in Policy SI 7 Reducing waste and supporting the circular economy and reduces the demand for natural materials.

9.10.5 Boroughs should identify and safeguard existing, planned and potential **sites for aggregate extraction, transportation, processing and manufacture** – and recognise where there may be benefits in their co-location. Existing and future wharf capacity is essential, especially for transporting marine-dredged aggregates, and should be protected in accordance with Policy SI 5 Water infrastructure. Equally important are railway depots for importing crushed rock from other parts of the UK. Railheads are vital to the sustainable movement of aggregates and boroughs should safeguard these sites in line with Policy T7 Deliveries, servicing and construction. Boroughs should also safeguard sites for the production and distribution of aggregate products.

9.10.6 Development proposals and planning decisions should ensure that **impacts to environment, heritage and amenity values** are considered, including the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality. Principal issues include noise, dust, air quality, lighting, archaeological and heritage features, traffic, land contamination, impacts to surface and ground water and land stability.

9.10.7 **Sites for depots** may be particularly appropriate in preferred industrial locations and other employment areas. Boroughs should examine the feasibility of using quarries as CD&E recycling sites once mineral extraction has finished.

9.10.8 Mineral Planning Authorities are required to prepare an annual **Local Aggregates Assessment** (LAA). The Mayor will work with boroughs and the London Aggregates Working Party to explore options for the preparation of joint LAAs in the future.

Policy SI 11 Hydraulic fracturing (Fracking)

A Development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing should be refused.

9.11.1 In line with the Plan's policy approach to energy efficiency, renewable energy, climate change, air quality, and water resources, the Mayor does not support fracking in London.

9.11.2 The British Geological Survey concluded in a 2014 report for the Department of Energy and Climate Change that "there is no significant Jurassic shale gas potential in the Weald Basin".[171] It is highly unlikely that there is any site that is geologically suitable for a fracking development in London.

9.11.3 Should any London fracking proposal come forward there is a high probability that it would be located on **Green Belt or Metropolitan Open Land**. Furthermore, London and the south east of England are **seriously water-stressed areas**. Fracking operations not only use large amounts of water but also presents risks of potential contamination, presenting significant risks to London.

9.11.4 In addition to avoiding or mitigating adverse construction and operational impacts (noise, dust, visual intrusion, vehicle movements and lighting, on both the natural and built environment, including air quality and the water environment), any fracking proposal would need to take full account, where relevant, of the following **environmental constraints**:

- Areas of Outstanding Natural Beauty
- Sites of Special Scientific Interest
- Groundwater Source Protection Zone 1
- Special Protection Areas (adopted or candidate)
- Special Areas of Conservation (adopted or candidate)
- Sites of Metropolitan Importance for Nature Conservation
- groundwater or surface water

171 The Jurassic shales of the Weald Basin: geology and shale oil and shale gas resource estimation, British Geological Survey, 2014

9.11.5 The United Kingdom Onshore Oil and Gas Group (UKOOG), which represents the industry, has established a **Community Engagement Charter** for new onshore oil and gas proposals.[172] The Charter sets out a number of commitments for operators which includes engagement with local communities at each of the three main stages of operations (exploration, appraisal and production). Where any proposals for fracking to come forward, applicants who are members of UKOOG would be expected to comply with these commitments.

Policy SI 12 Flood risk management

A Current and expected flood risk from all sources (as defined in paragraph 9.2.12) across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.

B Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Local Flood Risk Management Strategies, where necessary, to identify areas where particular and cumulative flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should cooperate and jointly address cross-boundary flood risk issues including with authorities outside London.

C Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

D Developments Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.

E Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.

172 Community Engagement Charter – oil and gas from unconventional reservoirs, UKCOOG, 2013, http://www.ukoog.org.uk/community/charter

F Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.

G Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.

9.12.1 In London, the boroughs are **Lead Local Flood Authorities** (LLFAs) and are responsible, in particular, for local surface water flood risk management and for maintaining a flood risk management assets register. They produce Local Flood Risk Management Strategies. LLFAs should cooperate on strategic and cross-boundary issues.

9.12.2 The **Regional Flood Risk Appraisal** (RFRA) considers all sources of flood risk including tidal, fluvial, surface water, sewer, groundwater and reservoir flooding and has been updated in collaboration with the Environment Agency. The RFRA provides a spatial analysis of flood risk including consideration of risks at major growth locations such as Opportunity Areas and Town Centres and key infrastructure assets. The Government's updated allowances for climate change are reflected in the expected sea level rise and increased flood risks considered in the RFRA. The updated allowances consider the lifetime, vulnerability and location of a development.

9.12.3 The **Thames Estuary 2100 Plan** (TE2100), published by the Environment Agency, and endorsed by Government, focuses on a partnership approach to tidal flood risk management. It requires the ability to maintain and raise some tidal walls and embankments. The Environment Agency estimates that a new Thames Barrier is likely to be required towards the end of the century. Potential sites will be needed in Kent and/or Essex requiring close partnership working with the relevant local authorities.

9.12.4 The concept of Local Authorities producing **Riverside Strategies** was introduced through the TE2100 Plan to improve flood risk management in the vicinity of the river, create better access to and along the riverside, and improve the riverside environment. The Mayor will support these strategies.

9.12.5 The Environment Agency's Thames River Basin District **Flood Risk Management Plan** is part of a collaborative and integrated approach to catchment planning for water. Measures to address flood risk should be integral to development proposals and considered early in the design process. This will ensure they provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Natural flood risk management in the upper river catchment areas can also help to reduce risk lower in the catchments. Making space for water when considering development proposals is particularly important where there is significant exposure to flood risk along tributaries and at the tidal-fluvial interface. The Flood Risk Management Plan should inform the boroughs' Strategic Flood Risk Assessments.

9.12.6 In terms of mitigating **residual risk**, it is important that a strategy for resistance and then resilience including safe evacuation and quick recovery to address such risks is in place; this is also the case for utility services. In the case of a severe flood, especially a tidal flood, many thousands of properties could be affected. This will make rescue and the provision of temporary accommodation challenging. Designing buildings such that people can remain within them and be safe and comfortable in the unlikely event of such a flood, will improve London's resilience to such an event.

Policy SI 13 Sustainable drainage

A Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.

B Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:

1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
2) rainwater infiltration to ground at or close to source
3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)

4) rainwater discharge direct to a watercourse (unless not appropriate)
5) controlled rainwater discharge to a surface water sewer or drain
6) controlled rainwater discharge to a combined sewer.

C Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.

D Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

9.13.1 London is at particular risk from surface water flooding, mainly due to the large extent of impermeable surfaces. Lead Local Flood Authorities have responsibility for managing surface water drainage through the planning system, as well as ensuring that appropriate maintenance arrangements are put in place. **Local Flood Risk Management Strategies and Surface Water Management Plans** should ensure they address flooding from multiple sources including surface water, groundwater and small watercourses that occurs as a result of heavy rainfall.

9.13.2 Development proposals should aim to get as close to greenfield run-off rates[173] as possible depending on site conditions. The **well-established drainage hierarchy** set out in this policy helps to reduce the rate and volume of surface water run-off. Rainwater should be managed as close to the top of the hierarchy as possible. There should be a preference for green over grey features, and drainage by gravity over pumped systems. A blue roof is an attenuation tank at roof or podium level; the combination of a blue and green roof is particularly beneficial, as the attenuated water is used to irrigate the green roof.

9.13.3 For many sites, it may be appropriate to use **more than one form of drainage**, for example a proportion of rainwater can be managed by more sustainable methods, with residual rainwater managed lower down the hierarchy. In some cases, direct discharge into the watercourse is an appropriate approach, for example rainwater discharge into the tidal Thames or a dock. This should include suitable pollution prevention filtering measures, ideally by using soft engineering or green infrastructure. In addition, if direct discharge is to a watercourse where

173 The runoff that would occur from a site in undeveloped natural state.

the outfall is likely to be affected by tide-locking, suitable storage should be designed into the system. However, in other cases direct discharge will not be appropriate, for example discharge into a small stream at the headwaters of a catchment, which may cause flooding. This will need to be assessed on a case-by-case basis, taking into account the location, scale and quality of the discharge and the receiving watercourse. The maintenance of identified drainage measures should also be considered in development proposals.

9.13.4 The **London Sustainable Drainage Action Plan** complements this policy. It contains a series of actions to make the drainage system work in a more natural way with a particular emphasis on retrofitting.

Policy SI 14 Waterways – strategic role

A Development Plans and development proposals should address the strategic importance of London's network of linked waterways, including the River Thames, and should seek to maximise their multifunctional social, economic and environmental benefits.

B To ensure coordination and alignment at the interface between terrestrial and marine planning, Development Plans and development proposals should take account of the emerging Marine Spatial Plans prepared by the Marine Management Organisation.

C Boroughs are encouraged to work together on policies or other appropriate area-based strategies that address cross-boundary waterways issues.

D To reflect the distinctiveness of areas that specifically relate to the River Thames, relevant Development Plans should designate, and ensure the maintenance of, Thames Policy Areas (TPAs). Setting the boundary of TPAs should be done in consultation with neighbouring boroughs, including those across the river. Boroughs are encouraged to plan for TPAs through joint Thames Strategies.

E Joint Thames Strategies and other area-based joint waterways strategies should consider:

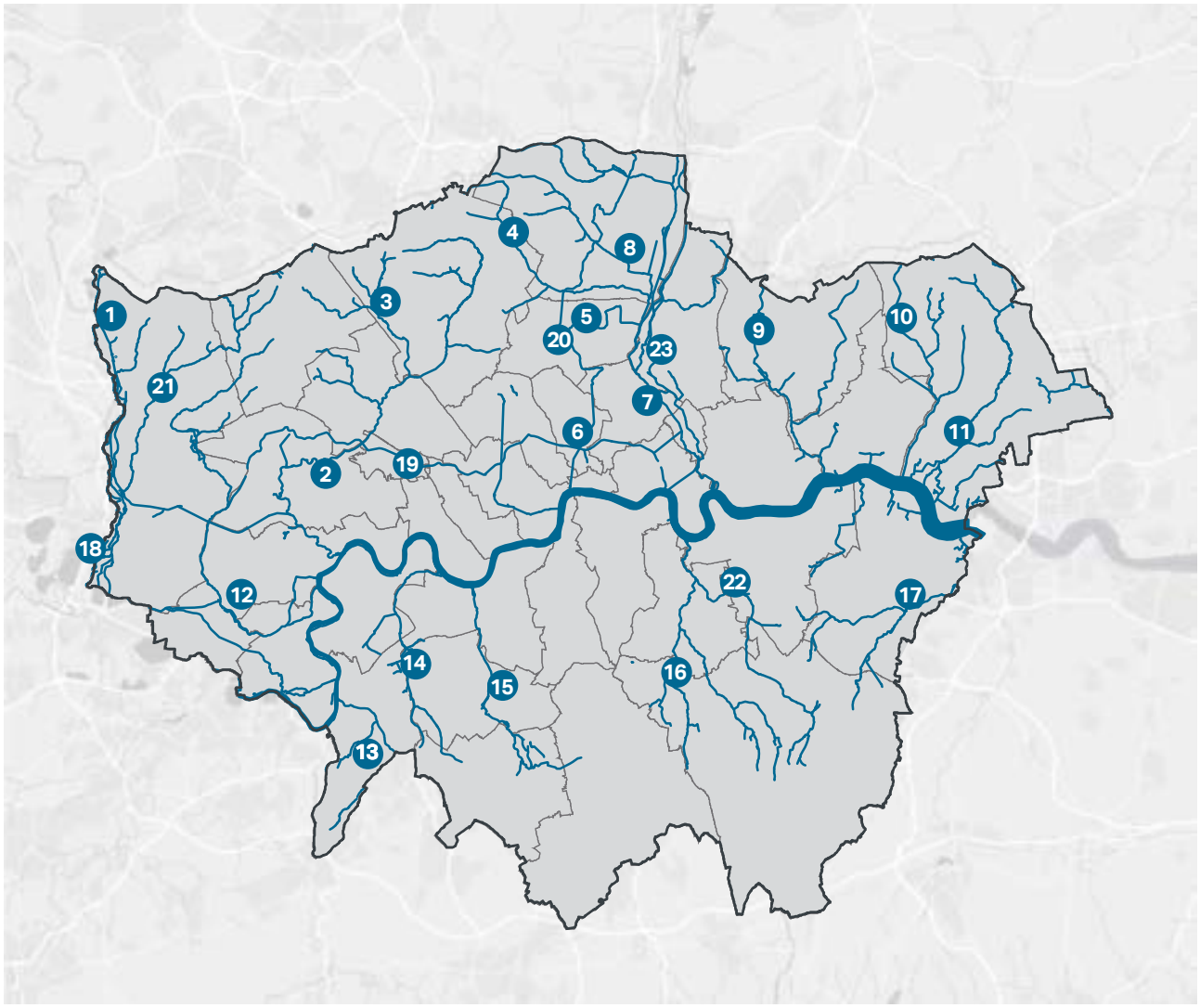
- the local character of the river/waterway
- water-based passenger and freight transport nodes
- development sites and regeneration opportunities

- opportunities for environmental/ecological and urban design improvements
- sites of ecological, historic, or archaeological importance
- sites, buildings, structures, landscapes and views of particular sensitivity or importance
- focal points of public activity
- inclusive public access
- strategic cultural value
- recreation and marine infrastructure
- river crossings and other structures
- indicative flood risk and water quality.

9.14.1 The term 'waterways' does not only refer to the River Thames, its tributary rivers and canals, but also to other water spaces including docks, lakes and reservoirs. **This network of linked waterways** – also known as the Blue Ribbon Network – is of strategic importance for London. Every London borough contains some waterways – 17 border the Thames and 15 contain canals (see Figure 9.6).

9.14.2 London's **waterways are multifunctional assets**. They provide transport and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage assets, including World Heritage Sites, landscapes, views, cultural and community activities; as well as drainage, flood and water management and urban cooling functions. As such, they provide environmental, economic and health and wellbeing benefits for Londoners and play a key role in place making. They also provide a home for Londoners living on boats. The waterways are protected and their water-related use – in particular safe and sustainable passenger and freight transport, tourism, cultural, community and recreational activities, as well as biodiversity – is promoted. Many of these functions are also supported by boroughs' local Riverside Strategies, the Environment Agency's Thames River Basin Management Plan and the Port of London Authority's Vision for the Thames. In addition to the Thames, other water spaces, and in particular canals, have a distinct value and significance for London and Londoners.

Figure 9.6 - London's Network of Waterways (the Blue Ribbon Network)



London's Waterways

● Waterways

Note: Not all tributaries shown

Source: OS Open Rivers

Contains OS data © Crown copyright and database right (2017)

1. Grand Union Canal
2. River Brent
3. Silk Stream
4. Pymmes Brook
5. Moselle Brook
6. Regents Canal
7. Lee Navigation
8. Salmons Brook
9. River Roding
10. River Rom
11. Ingrenbourne R.
12. R. Crane
13. Hogsmill River
14. Beverley Brook
15. R. Wandle
16. Ravensbourne R.
17. River Cray
18. River Colne
19. Paddington Arm
20. New River
21. River Pinn
22. River Quaggy
23. River Lea

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9.14.3 The **Thames and London Waterways Forum**[174] has been established jointly by the GLA, TfL and the Port of London Authority to address waterways priorities set out in this Plan, the Mayor's Transport Strategy, the London Environment Strategy and the Port of London Authority's Vision for the Thames.

9.14.4 As London's waterways cross borough boundaries, it is important to plan for their management strategically. Boroughs are encouraged to work together to develop appropriate policies or **joint area-based waterways strategies** to maximise the multifunctional benefits waterways provide.

9.14.5 The River Thames is a strategically-important and iconic feature of London. It is a focal point for London's identity reflecting its heritage, natural and landscape values as well as cultural opportunities. Its character changes on its way through London. Where **Thames Policy Areas** (TPAs) are not defined in Development Plans, the boundaries defined in Figure 9.7 apply. Within TPAs, lower-height thresholds for referable planning applications apply (25m compared to 30m elsewhere).

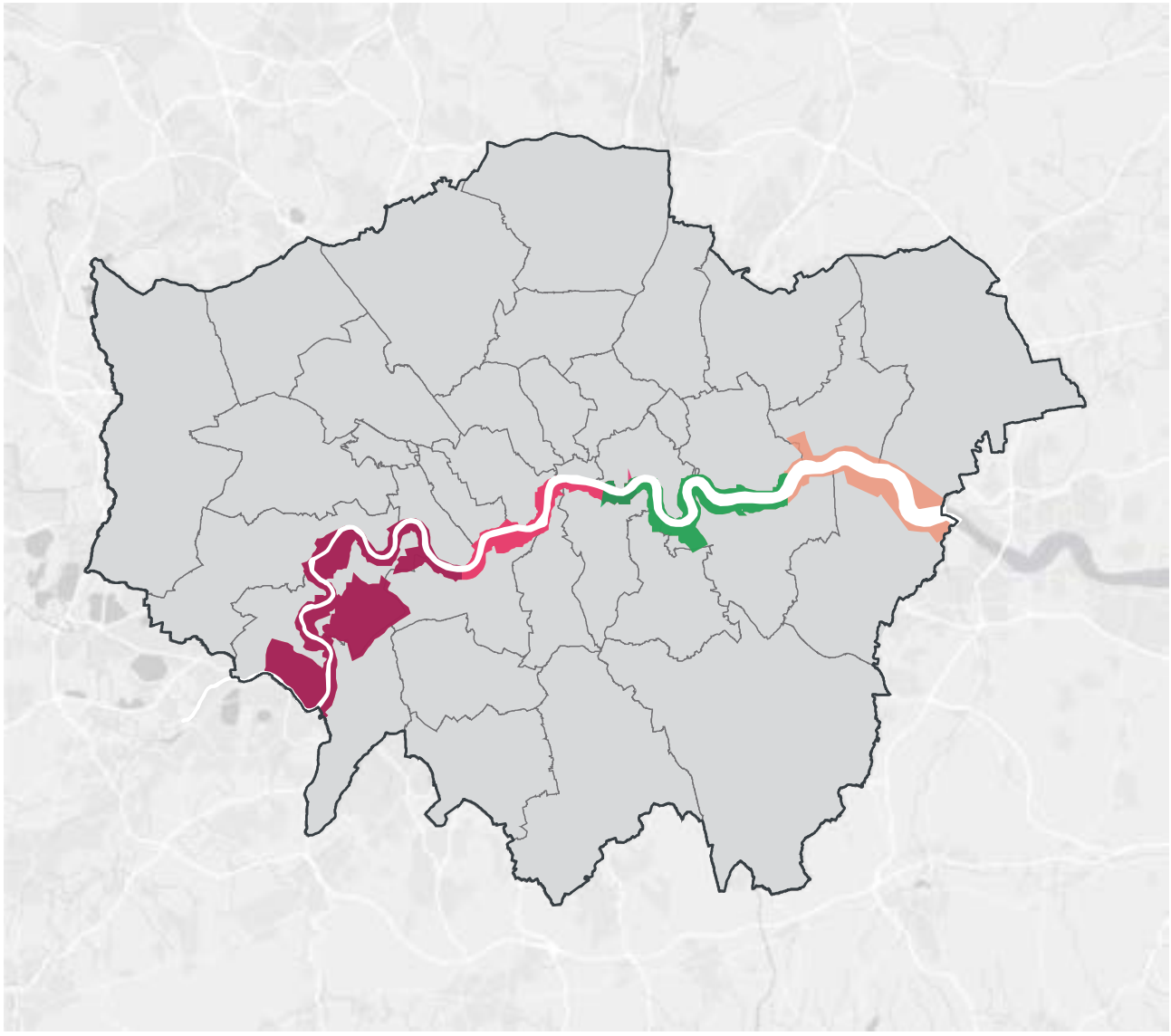
9.14.6 In **defining TPA boundaries**, boroughs should work collaboratively and have regard to the following:

- proximity to the Thames
- clear visual links between areas, buildings and the river
- specific geographical features such as main roads, railway lines and hedges
- the whole curtilage of properties or sites adjacent to the Thames
- areas and buildings whose functions relate or link to the Thames
- areas and buildings that have an historic, archaeological or cultural association with the Thames
- consistent boundaries with neighbouring authorities.

9.14.7 **Joint Thames Strategies** should specifically identify and address deficiencies in: water-based passenger, tourism and freight transport; sport, leisure and mooring facilities; marine support infrastructure; and inclusive access and safety provision. Thames Strategies are in place for Hampton–Kew, Kew-Chelsea and East (of Tower Bridge). No joint strategy currently exists for the central section of the Thames (Chelsea-Tower Bridge).

174 The Forum replaces the former London Waterways Commission and the River Concordat Group.

Figure 9.7 - Thames Policy Areas



Thames Policy Areas

- Hampton to Wandsworth
- Wandsworth to Bermondsey
- Bermondsey to Woolwich
- Woolwich to Crayford Ness

Source: Town and Country Planning (Mayor of London) Order, CLG, 2008

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9.14.8 The interface between terrestrial land-side and marine planning is at the centre of on-going coordination and engagement with the Marine Management Organisation (MMO). The **South East Inshore Marine Plan** is currently under development as part of a suite of Marine Spatial Plans[175] under the Marine Policy Statement. It covers the coastline from Felixstowe to Dover, including the tidal Thames. Development Plans and development proposals should take account of these plans.

Policy SI 15 Water transport

A Development proposals should protect and enhance existing passenger transport piers and their capacity. New piers will be supported in line with the Port of London Authority and Transport for London's Pier Strategy. The necessary provision of moorings, waste and sewage facilities for passenger vessels should be provided.

B Existing boatyard sites should be protected and development proposals to increase their capacity or range of services should be supported. Alternative use of a boatyard site should only be accepted if the facilities of the site are re-provided at a site with equivalent or enhanced facilities in Greater London. Proposals for a new strategic-scale boatyard site, at an appropriate site within London, will be supported.

C Development proposals to facilitate an increase in the amount of freight transported on London's waterways should be supported.

D The Mayor will keep the network of safeguarded wharves under regular review. Boroughs should protect existing locations and identify new locations for additional waterborne freight. There may be opportunities to consolidate wharves as part of strategic land use change, in particular, within Opportunity Areas; these will need to ensure that the existing and potential capacity and operability of the safeguarded wharves is retained and where possible expanded.

E Safeguarded wharves should only be used for waterborne freight-handling use, including consolidation centres. The redevelopment of safeguarded wharves for other land uses should only be accepted if the wharf is no longer

175 South East Inshore Marine Plan, Marine Management Organisation, https://www.gov.uk/government/collections/south-east-marine-plan

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viable or capable of being made viable for waterborne freight-handling (see viability testing criteria). Temporary uses should only be allowed where they do not preclude the wharf being reused for waterborne freight-handling uses.

F Development proposals which increase the use of safeguarded wharves for waterborne freight transport, especially the reactivation of wharves which are currently not handling freight by water, will be supported.

G Development proposals on a safeguarded wharf that include the provision of a water freight use below or alongside another land use, must ensure that the water freight use is secured long-term, that the development is designed so that there are no conflicts of use and that the freight-handling capacity of the wharf is not reduced.

H Development proposals adjacent to or opposite safeguarded wharves (including vacant wharves) should be designed to minimise the potential for conflicts of use and disturbance, in line with the Agent of Change principle.

I Development proposals close to navigable waterways should maximise water transport for bulk materials during demolition and construction phases.

9.15.1 The Mayor will work with relevant partners to **increase the number of people travelling by river** on passenger and tourist services in line with the 20 million by 2035 patronage target outlined in the Port of London Authority (PLA) Thames Vision. This builds on significant passenger trip increases in recent years.

9.15.2 The PLA and Transport for London's **Pier Strategy** will promote extending river services to East London and its growth areas to encourage modal shift to the river. This will relieve road congestion and better integrate other forms of transport such as walking and cycling.

9.15.3 **Boatyards** are essential for servicing passenger and other vessels. Beyond the existing strategic-scale boatyard at Bay Wharf, Greenwich, research indicates that a further facility with the capability to repair and service large commercial boats is required. This is to avoid operators having to get their vessels serviced and repaired far beyond the Thames Estuary at the East Coast or even in the near continent.

9.15.4 Water transport is recognised as one of the most sustainable modes for **freight,** particularly for low-value, non-time-critical bulk movements. Water transport already reduces the number of lorry movements on London's roads and their associated negative impacts on Londoners. Greater use of water transport

has the ability to remove further lorries from London's roads. The Mayor will promote positive action to achieve this, including consolidation and the use of compulsory purchase powers where necessary, to bring inactive sites into use or to optimise the use of under-utilised sites. Appropriate access to the highway network and relevant freight-handling infrastructure such as jetties should also be protected.

9.15.5 Many of London's **river freight wharves** are located in areas of high demand and high value for other land uses. A network of wharves is protected from redevelopment by Safeguarding Directions. The Mayor will regularly review wharf safeguarding to ensure the changing need for waterborne freight is addressed. Where the transition of wharves from waterborne freight to other uses is acceptable, the re-use of those wharves for waterborne public transport use should be considered.

9.15.6 The **redevelopment of safeguarded wharves** should only be accepted if a wharf is no longer viable or capable of being made viable for waterborne freight-handling uses. The only exception to this would be for a strategic proposal of essential benefit for London, which cannot be planned for and delivered on any other site in Greater London.

9.15.7 Where a development proposal for a safeguarded wharf includes land uses unrelated to the handling of waterborne freight, the design of the development must not result in conflicts of use between wharf operations and the other land uses, nor constrain the **long-term use and viability** of the safeguarded wharf. The freight-handling capacity of the wharf must not be reduced and the reactivation of the wharf for waterborne freight handling must be delivered and secured for the long term in order for proposals to be deemed acceptable.

9.15.8 Factors to be considered in **assessing the viability of a safeguarded wharf** under Part E of this policy include:

- its size, shape, navigational access, road access, rail access (where possible), planning history, environmental impact and surrounding land use context
- its geographical location, in terms of proximity and connections to existing and potential market areas
- the existing and potential contribution it can make towards reducing road-based freight movements
- existing and potential relationships between the wharf and other freight-handling sites or land uses
- the location and availability of capacity at comparable alternative wharves, having regard to current and projected wharf capacity and market demands.

9.15.9 Appropriate **temporary uses on vacant safeguarded wharves** can ensure that investment in those wharves is maintained and negative perceptions are minimised. Temporary uses must maintain the existing freight-handling infrastructure to a specified standard and be limited by a temporary permission with a specific end date. Priority should be given to uses which require a waterside location. Temporary uses should not be permitted where a permanent freight-handling use is available.

9.15.10 Many wharves are in Opportunity Areas and/or are increasingly surrounded by different land uses that do not have an industrial or freight purpose. In line with the **Agent of Change principle**, new development next to or opposite wharves should utilise the site layout, building orientation, uses and materials to design out potential conflicts. Proposals for neighbouring development sites must ensure that appropriate highway access to wharves for commercial vehicles is maintained.

Policy SI 16 Waterways – use and enjoyment

A Development Plans and development proposals should protect and enhance waterway infrastructure.

B Development proposals should protect and enhance, where possible, water-related cultural, educational and community facilities and events, and new facilities should be supported and promoted, but should take into consideration the protection and other uses of the waterways.

C Development proposals that increase the provision of water sport centres and associated new infrastructure will be supported if a deficit in provision has been identified locally, and if the infrastructure does not negatively impact on navigation or on the protection of the waterway (see Policy SI 17 Protecting and enhancing London's waterways).

D Development proposals adjacent to waterways should protect and enhance, where possible, existing moorings. The provision of new moorings and/or required facilities (such as power, water and waste disposal) should be supported if they are:

1) off-line from main navigation routes, in basins or docks, unless there are negative impacts on navigation or on the protection of the waterway (see Policy SI 17 Protecting and enhancing London's waterways)

2) appropriately designed including the provision of wash mitigation, where necessary

3) managed in a way that respects the character of the waterways.

E Existing access points to waterways (including slipways and historic steps) and alongside waterways (including paths) should be protected and enhanced.

F Development proposals along waterways should protect and enhance inclusive public access to and along the waterway front and explore opportunities for new, extended, improved and inclusive access infrastructure to/from the waterways.

G Development proposals should improve and expand the Thames Path and the towpaths, improve alignment with the waterway where relevant, enhance them as walking routes, and provide better linkages to the transport network. This will require collaboration with relevant partners including London boroughs, the PLA, the Canal and River Trust, the Environment Agency and Natural England, as well as landowner, developer and community representatives. These paths will be public and not private spaces.

9.16.1 New development should utilise the waterways (also known as the Blue Ribbon Network) for transport purposes where possible, but also for active water-based leisure, and for informal waterside recreation or access. In order to make the maximum use of London's waterways a range of supporting infrastructure is required including jetties, moorings, slipways, steps and waterside paths (piers, wharves and boatyards are addressed in Policy SI 15 Water transport). **Waterways infrastructure** can directly enable water-based recreation and sports including rowing, canoeing and sailing. New water sports centres may bring such activities together, and development proposals should consider the affordability of these activities for Londoners. Waterways infrastructure can also facilitate the enjoyment of wildlife, landscapes, heritage and culture. There could be particular scope for new infrastructure within specific Opportunity Areas.

9.16.2 Moorings, moored boats, and continuous cruiser boats, as well as live-aboard boat dwellers are an integral part of the character of the waterways. There has been a significant increase in the number of boats on London's canals (from 2,000 sighted in 2010 to 5,000 in 2016), with a notable increase in central and eastern parts of London's network. There is a **deficit of short-stay and long-**

term moorings and required facilities (such as power, water and waste disposal) to meet this increase in demand, including for residential, leisure, visitor and commercial uses.

9.16.3 The Canal and River Trust has produced a London Mooring Strategy which provides an overview of the number of people living on boats on the canal network and identifies zones for potential **additional moorings**. Some community-based projects to create residential moorings may be considered as community-led housing (Part A4 of Policy H2 Small sites). In addition, a number of creative businesses such as artists' studios and post-production facilities are located on boats. Development proposals for residential moorings in particular should consider innovative solutions to address site-specific conditions, including wash, to enable the creation of new appropriate moorings without detrimentally impacting on navigation.

9.16.4 Historic steps and slipways to the Thames foreshore are vital for enabling access to/from activities and events. The **Thames Path and the towpaths** are particularly important in terms of providing safe access for a large number of Londoners along the waterways, facilitating their enjoyment of the river as well as providing health and wellbeing benefits as walking routes. Development proposals provide a significant opportunity to improve and expand the Thames Path and the towpaths, and to develop better linkages to the transport network. This requires prioritisation and collaboration between local, strategic and institutional partners. Borough River Strategies and Thames Strategies should support these opportunities.

9.16.5 Complementing development proposals for cultural facilities and events, the Mayor is producing, in partnership with the Port of London Authority, a case for a **Cultural Vision for the River Thames**. It aims to increase Londoners' engagement with the River for culture and leisure purposes, including night-time use and focusing on under-used areas. It also provides information on the heritage and importance of the River Thames and its banks to London's cultural life, especially in Opportunity Areas.

9.16.6 London's waterways are often an appropriate setting for public art and performance. People generally like to gather by the waterside and opportunities for this should be encouraged. The waterways are also a valuable **educational resource** with organisations promoting water-based educational programmes. This should also be encouraged.

Policy SI 17 Protecting and enhancing London's waterways

A Development Plans should support river restoration and biodiversity improvements.

B Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect and improve the foreshore, floodplain, riparian and adjacent terrestrial habitats, water quality as well as heritage value, should be supported. Development proposals to impound and narrow waterways should be refused.

C Development proposals should support and improve the protection of the distinct open character and heritage of waterways and their settings.

D Development proposals into the waterways, including permanently moored vessels, should generally only be supported for water-related uses or to support enhancements of water-related uses.

E Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character, environment and biodiversity and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctiveness and recognise these water spaces as environmental, social and economic assets.

F On-shore power at water transport facilities should be considered at wharves and residential moorings to help reduce air pollution.

9.17.1 London's rivers have been significantly altered from their natural state. **River restoration** seeks to enhance their biodiversity, water quality and amenity value. The London Rivers Action Plan,[176] and the Catchment Partnerships[177] which support the Thames River Basin Management Plan, identify many opportunities for river restoration, as well as showing examples that have been implemented around London.

9.17.2 Generally, permanently-moored vessels and **development into waterways** should only be permitted for water-related uses. However, ancillary uses, such as bars and restaurants (for example ancillary to a passenger pier), can support

176 http://www.therrc.co.uk/lrap/lplan.pdf

177 https://www.thames21.org.uk/catchment-partnerships-in-london/

enhancements of water-related uses, as well as improve access to or along waterways and related public realm. Ancillary uses can also add to the diversity, vibrancy and regeneration of waterways, in particular in basins or docks. The specific siting of such facilities requires careful consideration so that navigation, hydrology, biodiversity and the character, access to, and use of waterways is not compromised. The waterways should not be used as an extension of developable land in London, nor should parts be a continuous line of moored craft.

9.17.3 **Pollution** from vessels should be minimised in terms of emissions from vessels and related land-side infrastructure. A baseline is being established jointly with key stakeholders including TfL and the PLA, along with appropriate measures and investment to minimise impact. This includes the requirement in this policy to consider providing on-shore power at wharves and moorings.

9.17.4 Development proposal should protect and promote the vitality, attractiveness and historical interest of London's **remaining dock areas**.

Chapter 10

Transport

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Policy T1 Strategic approach to transport

A Development Plans should support, and development proposals should facilitate:

1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041

2) the proposed transport schemes set out in Table 10.1.

B All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

10.1.1 The integration of land use and transport, and the provision of a robust and resilient public transport network, are essential in realising and maximising growth and ensuring that different parts of the city are connected in a sustainable and efficient way. In order to help facilitate this, an integrated **strategic approach to transport** is needed, with an ambitious aim to reduce Londoners' dependency on cars in favour of increased walking, cycling and public transport use. Without this shift away from car use, which the policies in the Plan and the Mayor's Transport Strategy seek to deliver, London cannot continue to grow sustainably. To achieve sustainable growth, Development Plans should support walking, cycling and public transport through policies that support mode shift and the schemes in Table 10.1. Development proposals should facilitate sustainable travel through their location and design and by not precluding the implementation of the schemes in Table 10.1.

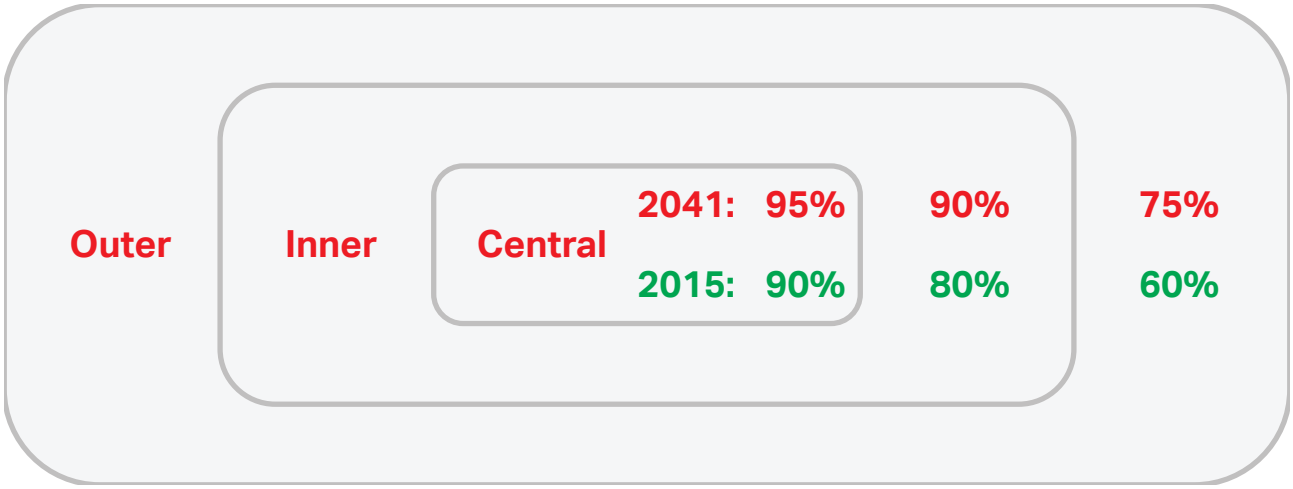
10.1.2 A shift from car use to more space-efficient travel also provides the only long-term **solution to the road congestion** challenges that threaten London's status as an efficient, well-functioning globally-competitive city. Reliable deliveries and servicing, and easy access to workplaces and key attractions are dependent on an increasingly-efficient transport network. Roads will continue to play a vital role in this, and greater priority needs to be given to making them more efficient for those activities that depend on them the most.

10.1.3 The Mayor will work with partners to minimise **freight trips** on the road network including through consolidation. He will promote safe, clean and efficient freight functions, including by road, rail, water and, for shorter distances, cycle.

10.1.4 **Rebalancing the transport system towards walking, cycling and public transport**, including ensuring high quality interchanges, will require sustained investment including improving street environments to make walking and cycling safer and more attractive, and providing more, better-quality public transport services to ensure that alternatives to the car are accessible, affordable and appealing. Achieving this is expected to result in different outcomes in different places, including modal splits in central, inner and outer London, as shown by Figure 10.1.

10.1.5 The **Mayor's Transport Strategy** provides more detail on the holistic approach that needs to be taken by all stakeholders to achieve these aims.

Figure 10.1 - Change in mode shares within central, inner and outer London expected to be required for a city-wide shift from 63 to 80 per cent share for walking, cycling and public transport



Policy T2 Healthy Streets

A Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.

B Development Plans should:

1) promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improve health and reduce health inequalities; reduce

car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities.

2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant.

C In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.

D Development proposals should:

1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance

2) reduce the dominance of vehicles on London's streets whether stationary or moving

3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

10.2.1 **Streets** account for 80 per cent of London's public spaces. High quality streets are fundamental to the character and efficient functioning of the city, and play a fundamental role in moving people around safely, improving public realm and providing spaces for people to come together. Successful streets are inclusive and provide for the various requirements of their users.

10.2.2 This Plan supports the implementation of the Mayor's Transport Strategy which aims to deliver the infrastructure and public realm required to **significantly increase levels of walking, cycling and public transport use** throughout London. It aims to make the city more accessible, inclusive, safe and welcoming to all, so that every Londoner can be active every day, creating a healthier city for people from all backgrounds, ensuring inequalities are reduced.

10.2.3 The **Healthy Streets Approach** is an evidence-based approach to improve health and reduce health inequalities, which will help Londoners use cars less, and walk, cycle and use public transport more. It supports the delivery of the

Mayor's aim that by 2041 all Londoners will be able to undertake at least the 20 minutes of active travel each day needed to stay healthy. It also requires better management of freight so the impact of moving goods, carrying out servicing and supporting construction on London's streets is lessened. To apply the Healthy Streets Approach, changes are required at a strategic, network and street level.

10.2.4 Londoners' direct interaction with the Healthy Streets Approach will be through the streets they use every day. The Healthy Streets Approach aims to bring about **positive changes to the character and use of the city's streets**. High-quality, pleasant and attractive environments with clean air and enough space for dwelling, walking, cycling and public transport use must be provided. The dominance of vehicles should be reduced by using design to ensure slower vehicle speeds and safer driver behaviour, in line with the Mayor's Vision Zero ambition. Measures that improve Londoners' experience of individual streets, including greening, to encourage them to live active lives should be embedded within new development.

10.2.5 Street environments are also affected by how the city's streets are planned and used at a larger scale. The Mayor will work with partners to deliver appealing local street environments and to plan the capital at the network level so that it functions better. This should be supported through development which facilitates opportunities to improve route choice and capacity for walking and cycling as well as linking to bus networks. As part of this, the Mayor will work with the freight industry, its customers and London's boroughs to develop more creative solutions to **managing freight**. This will include considering different uses of London's streets across the day so that more street space is available for walking, cycling and leisure purposes, while ensuring shops and services continue to thrive.

10.2.6 London's rapid growth means people need to travel more efficiently to keep the city functioning and to maintain and improve the quality of life for residents. S**trategic-level planning** to ensure walking, cycling and public transport are the first choices for travel is the only way to achieve this. Developing new housing around stations and improving connections to town centres will mean more people have the things they need within walking or cycling distance, while destinations further afield will be easily accessible by public transport.

10.2.7 The Healthy Streets Approach uses **10 indicators** that reflect the experience of being on streets. These indicators are based on evidence of what is needed to create a healthy, inclusive environment in which people choose to walk, cycle and use public transport.

Figure 10.2 - The Ten Healthy Streets Indicators

Source: Lucy Saunders

10.2.8 The Mayor has a long-term vision to reduce road danger so that no deaths or serious injuries occur on London's streets. This **Vision Zero** will be achieved by designing and managing a street system that accommodates human error and ensures impact levels are not sufficient to cause fatal or serious injury. This will require reducing the dominance of motor vehicles and targeting danger at source.

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Policy T3 Transport capacity, connectivity and safeguarding

A Development Plans should develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections.

B Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by:

1) safeguarding existing land and buildings used for public transport, active travel or related support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary)

2) identifying and safeguarding new sites/space and route alignments, as well as supporting infrastructure, to provide necessary strategic and local connectivity and capacity by public transport, walking and cycling, as well as to allow for sustainable deliveries and servicing

3) safeguarding London's walking and cycling networks

C Development Plans should appropriately safeguard the schemes outlined in Table 10.1. Development proposals should provide adequate protection for and/or suitable mitigation to allow the relevant schemes outlined in Table 10.1 to come forward. Those that do not, or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused.

D In Development Plans and development decisions, particular priority should be given to securing and supporting the delivery of upgrades to Underground lines, Crossrail 2, the Bakerloo line extension, river crossings and an eastwards extension of the Elizabeth line.

E Development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.

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Table 10.1 - Indicative list of transport schemes

Scheme	Cost*	Timescale
Healthy Streets and active travel		
Accessibility and inclusivity embedded in planning and design of Healthy Streets	low	2017-2041
Borough-led traffic reduction strategies (including workplace parking levies)	low	2017-2030
Cycle Hire network development	medium	2017-2041
Cycle network development (London-wide)	medium	2017-2030
Electric vehicle charging infrastructure	low	2017-2041
Freight consolidation programme	medium	2017-2041
Freight fleet emissions reductions	low	2017-2041
Highway decks to release land for housing (subject to further assessment)	high	2017-2030
Personal safety and security improvements on London's streets	low	2017-2041
Road pricing: existing schemes reviewed	low	2018-2020
Road pricing: next generation charging (subject to further assessment)	medium/high	2022-2041
Street trees increases	low	2017-2041
Sustainable drainage system improvements on railway land	low	2017-2041
Sustainable drainage system improvements on streets	low	2017-2041
Transformation of Parliament Square (subject to further assessment)	low	2020s
ULEZ in central and inner London	medium	2017-2021
LEZ strengthening London-wide for buses, coaches and HGVs	low	2020
Vision Zero (safer road user behaviours through education, engagement and enforcement, and improved vehicle safety including banning most dangerous HGVs/HGV Direct Vision)	low	2017-2041

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Scheme	Cost*	Timescale
Walk and cycle bridge between Battersea and Fulham	low	2020-2025
Walk and cycle river crossing: Nine Elms Pimlico Bridge	low	2020-2030
Walk and cycle river crossing between Rotherhithe and Canary Wharf	medium	2017-2030
Walk and cycle to school schemes	low	2017-2041
Walk and cycle to work and in local communities schemes	low	2017-2041
Walk and cycle wayfinding improvements	low	2017-2041
Walk London Network enhancements	low	2017-2041
Walking: improved local routes	low	2017-2030
Public Transport		
Bakerloo line extension	high	2020-2030
Beam Park station	low	2020-2030
Brighton Mainline Upgrade (higher frequencies)	high	2020-2030
Bus network: demand-responsive bus services (subject to further assessment)	medium	2017-2041
Bus network: enhancements to meet existing and future demand	medium	2017-2041
Bus network: Low Emissions Bus Zones (including bus priority)	low	2017-2030
Bus network: retrofitted and procuring cleaner buses	medium	2017-2041
Bus network: Silvertown Tunnel and associated bus services	medium	2017-2030
Bus network: wheelchair accessible bus stops	low	2017- 2041
Bus priority network and supporting infrastructure	medium	2017-2030
Bus transit pilots	low	2020-2041
Coach hub(s) upgrade and/or reprovision	medium	2020-2030

Scheme	Cost*	Timescale
Crossrail 2 (including West Anglia Main Line 4-tracking)	high	2020-2041
Crossrail 2 eastern branch (subject to further assessment)	high	2020-2041
Devolved suburban rail services to enable London suburban metro	high	2020-2030
DLR extension from Gallions Reach to Thamesmead (subject to further assessment)	medium	2017-2030
DLR station upgrade programme	low	2017-2041
DLR upgrades	high	2020-2041
Elizabeth line	high	2017-2021
Elizabeth line extension / rail enhancements east of Abbey Wood	medium/high	2020-2041
Heathrow Airport Southern Rail Access (required if airport expansion proceeds)	high	2020-2041
Heathrow Airport Western Rail Access (required if airport expansion proceeds)	high	2020-2041
HS2 and associated National Rail changes, including mitigation of impacts at street level	high	2020-2041
London Overground extension to Barking Riverside	medium	2017-2030
London Overground extension – West London Orbital	medium	2020-2030
London Overground extensions (subject to further assessment)	low	2030-2041
London Overground frequency upgrades (network-wide)	low	2017-2041
London Overground station upgrade programme	medium	2017-2041
London Overground strategic interchanges at Clapham Junction, Lewisham, Stratford and Old Oak Common and improved accessible interchange facilities across inner and outer London	low	2017-2030
London Underground air quality improvements	low	2017-2041

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Scheme	Cost*	Timescale
London Underground station capacity programme	high	2017-2041
London Underground step-free stations and more accessible vehicles.	medium	2017-2041
London Underground upgrades – various (e.g. Deep Tube programme, Four Lines Modernisation programme etc)	high	2017-2041
National Rail capacity increases (other lines)	medium	2020-2030
National Rail freight upgrades, especially to enable freight to bypass London	low	2017-2041
National Rail station capacity and step-free access upgrades	high	2017-2041
Night Overground	low	2017-2020
Night-time services on the DLR	low	2020-2030
Night Tube extensions	low	2017-2030
Northern line extension	high	2017-2020
River crossing at Gallion's Reach and/or Belvedere (subject to further assessment)	medium	2030-2041
River crossings (public transport) in East London (subject to further assessment)	medium	2017-2041
River services extensions to the east (subject to further assessment)	low	2017-2030
Stratford to Angel Road enhancements	medium	2017-2020
Sutton Link	medium	2020-2030
Thameslink Programme	high	2017-2020
Tram upgrades	medium	2017-2041
Walk and cycle ferry between North Greenwich and Canary Wharf (subject to further assessment)	low	2017-2030

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10.3.1 The Mayor recognises the vital importance of **working collaboratively** with a wide range of strategic partners to achieve good transport connectivity within London, and also between London and the Wider South East, the rest of the UK and a global network of other cities. Public transport is the most efficient means of moving people over distances that are too long to walk and cycle. London has one of the most extensive public transport networks in the world, with more than nine million trips made every day by bus, tram, tube, train and river. Use of the public transport system has increased by 65 per cent since 2000 largely because of enhanced services and an improved customer experience.

10.3.2 By 2041, London's transport networks will need to cater for over five million additional trips every day. There is therefore an urgent **need to improve public transport capacity, connectivity and quality of service** to ensure that it continues to cater for London's growth. Particular attention should be paid to how the complementary modes of walking, cycling and public transport interconnect at transport hubs and on streets across London.

10.3.3 Table 10.1 sets out both the transport schemes identified in the Mayor's Transport Strategy evidence base as being able to accommodate London's growth sustainably, and those that can achieve the wider economic, health and environmental objectives of this Plan. Additionally, a number of schemes are required to unlock growth (particularly after 2029),[178] which need to be appropriately protected so the Plan can be delivered.

10.3.4 When preparing Development Plans, local authorities should engage with TfL (and other relevant authorities) to appropriately plan for sites and routes, including those in Table 10.1, required to deliver an enhanced or expanded transport network.

10.3.5 Where a scheme in Table 10.1 could potentially be affected by a proposal, applicants should consult with TfL (and other relevant authorities) at an early stage to understand the latest status of the scheme (which may change over time) and identify impacts and whether any suitable mitigation is possible.

10.3.6 Development proposals should identify new sites or routes that are or will be required for local public transport and active travel connections, where appropriate. This should be set out in a **transport assessment or transport statement**. The way in which developments connect to local public transport and active travel networks plays a critical role in widening transport choice across London and therefore it may be necessary for proposals to facilitate the delivery of local connections through, for example, provision of land for walking and cycling routes or bus stops and supporting infrastructure.

178 Strategic Housing Land Availability Assessment, Mayor of London, Nov 2017

10.3.7 The **Elizabeth line** will increase capacity within central London by about ten per cent, relieving crowding on the Tube network and reducing journey times and congestion at stations. An eastward extension to the Elizabeth line could support thousands of new homes and jobs along the route in Bexley and north Kent. The extension could link to High Speed 1 at Ebbsfleet and boost rail connectivity throughout the Wider South East.

10.3.8 **Crossrail 2** is essential to London's future. This major new line will provide capacity for 270,000 people to travel into and across central London each morning and help to reduce crowding elsewhere on the network, as well as unlocking around 200,000 new homes and supporting up to 200,000 new jobs. Working with partners, the Mayor aims to open Crossrail 2 in the 2030s.

10.3.9 Extending the **Bakerloo line** is also necessary to provide extra capacity on the Tube in south east London. The scheme would enable capacity for up to for 65,000 passenger journeys during the morning and evening peaks and support more than 25,000 new homes and 5,000 jobs.

10.3.10 A key means of improving the efficiency of the transport network and unlocking growth potential is to **eliminate physical barriers to movement**, including in places where the Thames divides the communities on either side of it. Increasing the number and capacity of public transport links, as well as walking and cycling crossings, across the Thames will help to improve access to employment opportunities, support the development of thousands of new homes and enable healthier lifestyles.

10.3.11 The **bus network** also has an increasingly important role to play in the development of London, particularly delivering orbital connections. Therefore, the Mayor will work with partners to continue to develop a comprehensive network of frequent, high-quality bus routes.

Policy T4 Assessing and mitigating transport impacts

A Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.

B When required in accordance with national or local guidance,[179] transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.[180]

C Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.

E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.

F Development proposals should not increase road danger.

179 https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments

180 https://tfl.gov.uk/info-for/urban-planning-and-construction/guidance-for-applicants

10.4.1 It is important that the impacts and opportunities which arise as a result of development proposals are identified and assessed so that appropriate mitigations and opportunities are secured through the planning process. **Transport assessments** are therefore necessary to ensure that planning applications can be reviewed and assessed for their specific impacts and for their compatibility with the Healthy Streets Approach. Consideration of the potential impacts on internationally important wildlife sites should also be assessed, where required.

10.4.2 Transport assessments should include an assessment of demand arising from personal travel as well as from potential servicing and deliveries, taking into account the impacts both on all modes of transport including walking and cycling, and on streets as social spaces. For developments of strategic importance (development proposals that are referable to the Mayor), applicants are strongly advised to engage early with Transport for London through the **pre-application process** in order to ensure that all necessary elements are covered.[181]

10.4.3 It is important that development proposals **reduce the negative impact of development on the transport network** and reduce potentially harmful public health impacts. The biggest transport-related impact of development on public health in London is the extent to which it enables physical activity from walking, cycling and using public transport. The other main impacts on public health relate to air quality, road danger, noise, and severance. The phasing of development, and the use of travel plans and freight strategies, may help reduce negative impacts and bring about positive outcomes. Where adverse transport impacts have been identified from development proposals, mitigation will be sought in the form of financial contributions – to improve network service levels for example – or through directly providing infrastructure such as additional bus stops and street improvements.

10.4.4 New development that will give rise to significant numbers of new trips should be located in places well-connected by public transport, with capacity adequate to support the additional demand, or where there is a realistic prospect of additional access or capacity being provided in time to meet the new demand. The ability to absorb increased travel demand through active travel modes must also be considered. Funded proposals by applicants to improve transport access, capacity or connectivity are encouraged.

181 https://tfl.gov.uk/info-for urban-planning-and-construction/

Policy T5 Cycling

A Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:

1) supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure
2) securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.

B Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.[182] Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

C Development Plans requiring more generous provision of cycle parking based on local evidence will be supported.

D Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-street car parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision.

E Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers.

182 London Cycling Design Standards, Transport for London, https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2

F Where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard should be applied.

Table 10.2 - Minimum cycle parking standards*

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
A1	food retail above 100 sqm	1 space per 175 sqm gross external area (GEA)	areas with higher cycle parking standards (see Figure 10.3): • first 750 sqm: 1 space per 20 sqm; • thereafter: 1 space per 150 sqm (GEA) rest of London: • first 750 sqm: 1 space per 40 sqm; • thereafter: 1 space per 300 sqm (GEA)
	non-food retail above 100 sqm	• first 1000 sqm: 1 space per 250 sqm • thereafter: 1 space per 1000 sqm (GEA)	areas with higher cycle parking standards (see Figure 10.3): • first 1000 sqm: 1 space per 60 sqm; • thereafter: 1 space per 500 sqm (GEA) rest of London: • first 1000 sqm: 1 space per 125 sqm; • thereafter: 1 space per 1000 sqm (GEA)

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
A2-A5	financial / professional services; cafes & restaurants; drinking establishments; take-aways above 100 sqm	1 space per 175 sqm (GEA)	areas with higher cycle parking standards (see Figure 10.3): • 1 space per 20 sqm (GEA) rest of London: • 1 space per 40 sqm (GEA)
B1	business offices	• areas with higher cycle parking standards (see Figure 10.3): 1 space per 75 sqm • rest of London: 1 space per 150 sqm (GEA)	• first 5,000 sqm: 1 space per 500 sqm • thereafter: 1 space per 5,000 sqm (GEA)
	light industry and research and development	1 space per 250 sqm (GEA)	1 space per 1000 sqm (GEA)
B2-B8	general industrial, storage or distribution	1 space per 500 sqm (GEA)	1 space per 1000 sqm (GEA)
C1	hotels (bars, restaurants, gyms etc. open to the public should be considered individually under relevant standards)	1 space per 20 bedrooms	1 space per 50 bedrooms
C2	Hospitals	1 space per 5 FTE staff	1 space per 30 FTE staff
	care homes / secure accommodation	1 space per 5 FTE staff	1 space per 20 bedrooms

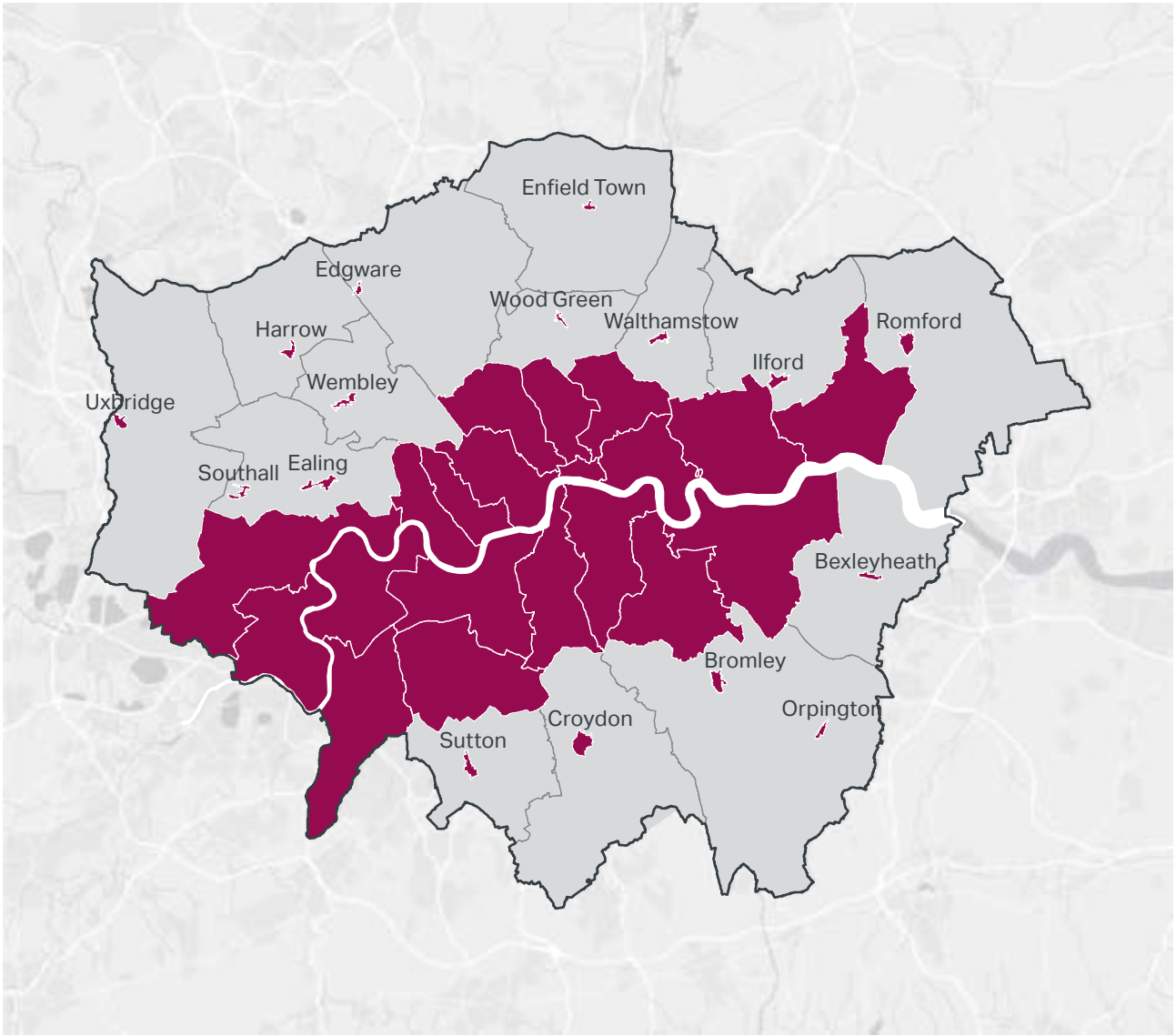
Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
C3-C4	dwellings (all)	• 1 space per studio or 1 person 1 bedroom dwelling • 1.5 spaces per 2 person 1 bedroom dwelling • 2 spaces per all other dwellings	• 5 to 40 dwellings: 2 spaces • Thereafter: 1 space per 40 dwellings
D1	Nurseries	1 space per 8 FTE staff + 1 space per 8 students	
	primary schools / secondary schools/ sixth form colleges	1 space per 8 FTE staff + 1 space per 8 students	1 space per 100 students
	universities and colleges	1 space per 4 FTE staff + 1 space per 20 FTE students	1 space per 7 FTE students
	health centre, including dentists	1 space per 5 FTE staff	1 space per 3 FTE staff
	other (e.g. library, church, etc.)	1 space per 8 FTE staff	1 space per 100 sqm (GEA)
D2	sports (e.g. sports hall, swimming, gymnasium, etc.)	1 space per 8 FTE staff	1 space per 100 sqm (GEA)
	other (e.g. cinema, bingo, etc.)	1 space per 8 FTE staff	1 per 30 seats
Student accommodation		0.75 spaces per bedroom	1 space per 40 bedrooms
Specialist older persons housing**		1 space per 10 bedrooms	1 space per 40 bedrooms
Sui generis		As per most relevant other standard e.g. casino and theatre = D2, room in large-scale purpose-built shared living = studio C3	

Use Class	Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
Stations	To be considered on a case by case basis through liaison with TfL. The level of provision should take into account the type and location of the station, current and future rail and cycle demand and the potential for journey stages to and from the station to be made by cycle. A step-change in provision is expected, especially at termini, in order to meet the Mayor's mode share target.	
* The minimum of two short-stay and two long-stay cycle parking spaces does not apply to A1-A5 developments of less than 100 sqm or to short-stay parking at residential developments of fewer than 5 dwellings. ** as defined by Policy H13 Specialist older persons housing. The Mayor will continue to gather evidence with a view to revising and updating this standard. Where appropriate, proposals should provide higher provision than the above standard where it is needed.		

10.5.1 Development should **facilitate and encourage cycling**, and reduce car dependency and the health problems it creates. Cycling is a space-efficient mode compared to cars so making streets attractive for cycling can bring benefits to all road users while also improving the experience of living, working and spending time in the city. The Mayor will deliver, in partnership with boroughs, a new London-wide network of strategic cycling routes which will transform the convenience and experience of cycling for all types of trips.

10.5.2 For some types of trip, the **level of cycling is dependent on the location of the destination**. For the boroughs identified on Figure 10.3 (the central and inner London boroughs, plus Richmond, Merton, Kingston, Hounslow and Barking & Dagenham), around 3.5 per cent of trips arriving at workplace, leisure and shopping destinations are made by cycle. This compares to around 1.5 per cent elsewhere in London.

Figure 10.3 - Boroughs and town centres where higher minimum cycle parking standards apply



Areas where higher minimum cycle parking standards apply

see table 10.2

- Higher minimum cycle parking standards

Source: Transport for London (TfL)

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10.5.3 The **minimum standards** for short-stay (for visitor / customer) cycle parking for Class A Uses and long-stay cycle parking (for employees) for office use in the locations identified on Figure 10.3 are thus set at twice the level as elsewhere – though the Mayor will support other boroughs adopting these higher standards borough-wide or for defined areas through their Development Plan Documents (such as existing Mini-Hollands, and Liveable Neighbourhoods or Opportunity Areas).

10.5.4 The locations where higher standards apply also include outer London Metropolitan and Major town centres where TfL has identified high potential for a switch to cycling. **Higher provision** in these locations is required to enable this increased level of cycling and contribute to Healthy Streets in town centres.

10.5.5 Cycle parking and cycle parking areas should allow easy access and provide **facilities for disabled cyclists**. This could include identifying and reserving specific spaces which provide step-free cycle parking and opportunities for people using adapted cycles, as well as providing facilities for other non-standard cycles such as tricycles, cargo bicycles and bicycles with trailers, for both long-stay and short-stay parking.

10.5.6 At **university campuses and schools**, cycle parking should be located in close proximity to the entrances of all buildings to provide convenience and choice for users. For nurseries and primary schools, an appropriate proportion of long-stay cycle parking spaces for students may be met through scooter parking. Nurseries should meet the standard through an appropriate mix of long and short-stay parking to cater for staff, those dropping off children, and children's cycle and scooter parking.

10.5.7 Staff cycle parking should be suitable for long-stay parking in terms of location, security and protection from the elements and inclement weather. In places of employment, **supporting facilities** are recommended, including changing rooms, maintenance facilities, lockers (at least two per three long-stay spaces are recommended) and shower facilities (at least one per ten long-stay spaces is recommended). Accessible facilities for disabled cyclists should also be provided.

10.5.8 **Short-stay cycle parking** must be available for shoppers, customers, messengers and other visitors, and must be convenient and readily accessible. It must have step-free access and be located within 15 metres of the main entrance wherever possible.

10.5.9 The provision of **space for folding bicycles** is generally not an acceptable alternative to conventional cycle parking. An exception may be applied in office developments in the CAZ, where the location of rail termini lends itself to greater levels of folding bicycle use. This should only be applied for up to 10 per cent of

long-stay spaces and where the full provision could not otherwise be provided. Provision of cycle hire caters for a different market of cyclist and also should not be accepted in lieu of cycle parking.

10.5.10 Where standards are based on floorspace, these have been calculated on the basis of the level of demand and potential growth in relation to Gross External Area (GEA). This calculation already takes into account that not all of the area covered by GEA will generate cycling trips.

Policy T6 Car parking

A Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.

B Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.

C An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.

D The maximum car parking standards set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.

E Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking.

F Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all use classes.

G Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6 .1 Residential parking, Policy T6 .2 Office Parking, Policy T6 .3 Retail parking, and Policy T6 .4 Hotel and leisure uses parking.

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All operational parking should make this provision, including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities.

H Where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people.

I Adequate provision should be made for efficient deliveries and servicing and emergency access.

J A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.

K Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area-based car-free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6 .1 Residential parking) must only do so for parts of London that are PTAL 0-1. Inner London boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential use classes in any part of London.

L Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.

10.6.1 To manage London's road network and ensure that people and businesses can move about the city as the population grows and housing delivery increases significantly, new parking provision must be carefully controlled. The **dominance of vehicles on streets** is a significant barrier to walking and cycling, reduces the appeal of streets as public places and has an impact on the reliability and journey times of bus services. Reduced parking provision can facilitate higher-density development and support the creation of mixed and vibrant places that are designed for people rather than vehicles. As the population grows, a

fixed road network cannot absorb the additional cars that would result from a continuation of current levels of car ownership and use. Implementing the parking standards in this Plan is therefore an essential measure to support the delivery of new housing across the city. In some areas, it will be necessary for boroughs to introduce additional parking controls to ensure new development is sustainable and existing residents can continue to park safely and efficiently.

10.6.2 **Maximum standards for car parking** take account of PTAL as well as London Plan spatial designations and use classes. Developments in town centres generally have good access to a range of services within walking distance, and so car-free lifestyles are a realistic option for many people living there. Opportunity Areas offer the potential to coordinate new transport investment with development proposals to embed car-free or car-lite lifestyles from the outset. Differences in car use and ownership between inner and outer London are recognised, with trip distances and trip patterns sometimes making walking and cycling difficult in outer London.

10.6.3 The approach to parking in **outer London Opportunity Areas** should be set out in Opportunity Area Planning Frameworks, complementing the OA mode share target.[183] Through OAPFs, parking provision can vary within an outer London OA to reflect PTAL, but the overall quantum must not exceed the relevant maximum standard.

10.6.4 When **calculating general parking provision within the relevant standards**, the starting point for discussions should be the highest existing or planned PTAL at the site, although consideration should be given to local circumstances and the quality of public transport provision, as well as conditions for walking and cycling. Disabled persons parking provision for Blue Badge holders, car club spaces and provision for electric or other Ultra-Low Emission vehicles should be included within the maximum provision and not in addition to it.

10.6.5 **Where no standard is provided**, the level of parking should be determined on a case-by-case basis taking account of Policy T6 Car parking, current and future PTAL and wider measures of public transport, walking and cycling connectivity.

10.6.6 The quantum of any parking provision, as well as its design and implementation, should have regard to the need to promote active modes and public transport use. Provision should be **flexible for different users and adaptable** to future re-purposing in the context of changing requirements, including technological change. Alternative uses could include: seating, places for people to stop and spend time, areas of planting or additional cycle parking.

183 As required by the Mayor's Transport Strategy

10.6.7 The general principles outlined in paragraphs 10.6.4 to 10.6.6 above apply to the parking standards set for residential, office (and Use Classes B2 and B8), retail, and hotel and leisure uses under Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking. In relation to Policy T6 Car parking Part L, where industrial sites are redeveloped parking will be considered on a case by case basis as set out in paragraph 10.6.18.

10.6.8 Surface-level car parking should be **permeable** in accordance with Policy Policy SI 13 Sustainable drainage.

Policy T6.1 Residential parking

A New residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category.

B Parking spaces within communal car parking facilities (including basements) should be leased rather than sold.

C All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.

D Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking. Any car club spaces should have active charging facilities.

E Large-scale purpose-built shared living, student accommodation and other sui generis residential uses should be car-free.

F The provision of car parking should not be a reason for reducing the level of affordable housing in a proposed development.

G Disabled persons parking should be provided for new residential developments. Residential development proposals delivering ten or more units must, as a minimum:

1) ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset
2) demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon

request as soon as existing provision is insufficient. This should be secured at the planning stage.

H All disabled persons parking bays associated with residential development must:

1) be for residents' use only (whether M4(2) or M4(3) dwellings)
2) not be allocated to specific dwellings, unless provided within the curtilage of the dwelling
3) be funded by the payment of a commuted sum by the applicant, if provided on-street (this includes a requirement to fund provision of electric vehicle charging infrastructure)
4) count towards the maximum parking provision for the development
5) be designed in accordance with the design guidance in BS8300vol.1
6) be located to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core, and the route should be preferably level or where this is not possible, should be gently sloping (1:60-1:20) on a suitable firm ground surface.

Table 10.3 - Maximum residential parking standards

Location	Number of beds	Maximum parking provision*
Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4	All	Car free~
Inner London PTAL 3	All	Up to 0.25 spaces per dwelling
Inner London PTAL 2 Outer London Opportunity Areas	All	Up to 0.5 spaces per dwelling
Inner London PTAL 0 – 1	All	Up to 0.75 spaces per dwelling

Location	Number of beds	Maximum parking provision*
Outer London PTAL 4	1 – 2	Up to 0.5 - 0.75 spaces per dwelling+
Outer London PTAL 4	3+	Up to 0.5 - 0.75 spaces per dwelling+
Outer London PTAL 2 – 3	1 – 2	Up to 0.75 spaces per dwelling
Outer London PTAL 2 – 3	3+	Up to 1 space per dwelling
Outer London PTAL 0 – 1	1 – 2	Up to 1.5 space per dwelling
Outer London PTAL 0 – 1	3+	Up to 1.5 spaces per dwelling^

* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed

~ With the exception of disabled persons parking, see Part G Policy T6 .1 Residential parking

+ When considering development proposals that are higher density or in more accessible locations, the lower standard shown here should be applied as a maximum

^ Boroughs should consider standards that allow for higher levels of provision where there is clear evidence that this would support additional family housing

10.6.9 The Mayor's ambition is for London to be a city where it is easy for all disabled people to live and travel in London. Disabled people should have a genuine choice of housing that they can afford within a local environment that meets their needs. This means taking a holistic approach to creating streets, local services and a public transport network that caters for disabled people and people with long-term health conditions. It is recognised that some disabled people will rely on car travel more than others, whether as a passenger or a driver. This means that to ensure genuine housing choice, **disabled persons' parking** should be provided for new residential developments. In some circumstances this may include visitor parking for disabled residents who might have regular visitors such as carers. Any such parking should be marked out as such and restricted only for these users from the outset.

10.6.10 Where general parking is provided on-site, any disabled persons parking bays not provided at the outset should be identified on plan. For car-free development, how provision will be made, including whether bays are provided on-site or on-street, should be clearly set out and justified, in line with relevant guidance and local policies. All provision should be fully assessed and demonstrably consistent with the **inclusive design principles** of Policy D5 Inclusive design, and GG1 Building strong and inclusive communities; further information on how disabled persons parking should be approached and delivered will be set out in guidance.

10.6.11 Through **Parking Design and Management Plans**, applicants should provide details of how initial and future provision of disabled persons parking spaces will be made, managed and enforced. They should show where these spaces will be located and demonstrate how their availability will be made clear to residents prior to occupation to inform their housing decision. Where a bay is being marked up for a particular resident, this should be done prior to occupation. Details should also be provided of how existing or future residents would request a bay, how quickly it would be created and what, if any, provision of visitor parking for disabled residents is available. In car-free developments, at no time should any on-site space marked on plan for future disabled persons parking be used for general parking.

10.6.12 In implementing this policy, if three per cent of a scheme is less than one space, this should be rounded up to one.

10.6.13 Given the aims of this Plan and the Mayor's Transport Strategy in reducing car use and the priority given to affordable housing provision, to ensure the provision of parking does not impact on the level of affordable housing that is viable, the inclusion of parking provision (excluding disabled persons parking), even where consistent with the standards set out above, **should not result in a reduction to affordable housing**.

10.6.14 **Parking spaces should be leased rather than sold** to ensure the land they take up is used as efficiently as possible over the life of a development. This includes ensuring that disabled persons parking bays can be used by those who need them at any given time and ensuring enlarged bays are available to be converted to disabled persons parking bays as required. Leasing allows for spaces with active charging points to serve electric or other Ultra-Low Emission vehicles, and can more easily support passive provision becoming active. Leasing also supports parking provision to be adaptable to future re-purposing, such as following changes to transport technology or services. Leases should be short enough to allow for sufficient flexibility in parking allocation to reflect changing circumstances.

10.6.15 **Car clubs** count towards the maximum parking permitted because they share many of the negative impacts of privately-owned cars. However, in some areas, car club spaces can help support lower parking provision and car-lite lifestyles by enabling multiple households to make infrequent trips by car.

Policy T6.2 Office Parking

A The maximum parking standards set out in Table 10.4 should be applied to new office development.

B In well-connected parts of outer London, including town centres, in close proximity to stations and in Opportunity Areas, office developments are encouraged to be car-free.

C Car parking provision at Use Classes Order B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to these office parking standards and take account of the significantly lower employment density in such developments. A degree of flexibility may also be applied to reflect different trip-generating characteristics. In these cases, appropriate provision for electric or other Ultra-Low Emission vehicles should be made.

D Outer London boroughs wishing to adopt more generous standards are required to do so through an evidence-based policy in their Development Plan that identifies the parts of the borough in which the higher standards will be applied, and justifies those standards, including:

1) the provision and operation of (existing and future) public transport, especially in relation to bus reliability
2) the impact on the ability to deliver Healthy Streets, promote active travel and deliver mode shift
3) the impact on congestion and air quality locally and on neighbouring boroughs and districts outside London as appropriate
4) a commitment to increase or enhance publicly-available cycle parking
5) a requirement (via Travel Plans) to reduce car parking provision over time and convert it to other uses.

E Boroughs should not seek to adopt more generous standards borough-wide.

F Operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure for electric or other

Ultra-Low Emission vehicles, including active charging points for all taxi spaces.

G A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision.

H Disabled persons parking should be provided as set out in Policy T6 .5 Non-residential disabled persons parking.

Table 10.4 - Maximum office parking standards

Location	Maximum parking provision*
Central Activities Zone and inner London	Car free^
Outer London Opportunity Areas	Up to 1 space per 600 sq.m. gross internal area (GIA)
Outer London	Up to 1 space per 100 sq.m. (GIA)
Outer London locations identified through a DPD where more generous standards apply	Up to 1 space per 50 sq.m. (GIA)

* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed

^ With the exception of disabled persons parking, see Policy T6 .5 Non-residential disabled persons parking

10.6.16 Parking associated with offices has the potential to generate car travel in the morning and evening peaks when streets are the most congested. In many parts of London this means that bus travel is less reliable and active travel is less attractive. **Office parking** also has the potential to induce habitual car travel even where alternatives to the car exist, impacting on the ability for the Mayor to meet his mode share target for 80 per cent of trips to be made by public transport and active travel. For these reasons, offices should be located in places that are accessible by public transport, walking and cycling and car parking provision should be kept to a minimum.

10.6.17 The **management of parking** that is provided should ensure that employees and visitors are encouraged to use non-car modes as much as possible. It should also ensure that the operation of car and cycle parking and the public

realm does not prioritise vehicles over people and that under-utilised parking is converted to other uses such as amenity space or green infrastructure.

10.6.18 For **industrial sites**, the role of parking – both for workers and operational vehicles – varies considerably depending on location and the type of development proposed. Provision should therefore be determined on a case-by-case basis, with the starting point for commuter parking being the standards in Table 10.4 with differences in employment densities[184] taken into account. Flexibility may then be applied in light of site-specific circumstances as above. Operational parking should be considered and justified separately.

Policy T6.3 Retail parking

A The maximum parking standards set out in Table 10.5 should be applied to new retail development, unless alternative standards have been implemented in a Development Plan through the application of Policy G below. New retail development should avoid being car-dependent and should follow a town centre first approach, as set out in Policy SD7 Town centres: development principles and Development Plan Documents.

B To make the most efficient use of land, the starting point for assessing the need for parking provision at all new retail development should be the use of existing public provision, such as town centre parking.

C Opportunities should be sought to make the most of all existing parking, for example using office parking for retail outside working hours. Where shared parking is identified, overall provision should be reduced to make better use of land and more intensively use the parking that remains.

D If on-site parking is justified it should be publicly-available.

E Disabled persons parking should be provided as set out in Policy T6 .5 Non-residential disabled persons parking.

F Where car parking is provided at retail development, provision for rapid electric vehicle charging should be made.

184 Density Guide 3rd Edition, Homes & Communities Agency, 2015, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/484133/employment_density_guide_3rd_edition.pdf (for standard employment density assumptions, see the employment density matrix)

G Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in:

1) A diversion of demand from town centres to out of town centres, undermining the town centres first approach.
2) A significant reduction in the viability of mixed-use redevelopment proposals in town centre.

Table 10.5 - Maximum retail parking standards

Location	Maximum parking provision*
Central Activities Zone and all areas of PTAL 5-6	Car-free^
Inner London Outer London Opportunity Areas Outer London retail below 500 sq.m.	Up to 1 space per 75 sq.m. gross internal area (GIA)
Rest of outer London	Up to 1 space per 50 sq.m. (GIA)

* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed

^ With the exception of disabled persons parking, see Policy T6 .5 Non-residential disabled persons parking.

10.6.19 Retail developments are significant trip attractors and should be located in places that are well-connected by public transport. Many retail trips are potentially walkable or cyclable, and improving the attractiveness of these modes through improved public realm and the application of the Healthy Streets Approach will support the vitality of London's many town centres and high streets. As such, **car parking provision should be kept to a minimum** and space should be used for activities that create vibrancy and contribute to the formation of liveable neighbourhoods.

10.6.20 Where significant provision of car parking at retail development can be justified, provision of r**apid electric vehicle charging facilities** should be made. Supplementary Planning Guidance on what provision is required will be provided.

10.6.21 As with office parking, any provision that is made should be carefully **managed** so that it does not undermine the attractiveness of alternatives to the car.

Policy T6.4 Hotel and leisure uses parking

A In the CAZ and locations of PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing.

B In locations of PTAL 0-3, schemes should be assessed on a case-by- case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels.

C All operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces.

D Disabled persons parking should be provided as set out in Policy T6 .5 Non-residential disabled persons parking.

10.6.22 Hotel and leisure uses should be located in accessible locations to encourage walking, cycling and public transport use. Where Development Plans specify **lower local maximum standards** for general or operational parking, these should be followed.

Policy T6.5 Non-residential disabled persons parking

A Disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.

B Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with.

C Designated bays should be marked up as disabled persons parking bays from the outset.

D Enlarged bays should be large enough to become disabled persons parking bays quickly and easily via the marking up of appropriate hatchings and

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symbols and the provision of signage, if required i.e. if it can be demonstrated that the existing level of disabled persons parking is not adequate. The process for converting enlarged bays should be set out in a Parking Design and Management Plan and secured at the planning stage.

E Designated disabled persons parking bays and enlarged bays should be designed in accordance with the design guidance provided in BS8300: Vol 1.

Table 10.6 - Non-residential disabled persons parking standards

Use	Designated bays (Per cent of total parking provision)	Enlarged bays (Per cent of total parking provision)
Workplace	5 per cent	5 per cent
Education	5 per cent	5 per cent
Retail, recreation, hotels and leisure	6 per cent	4 per cent
Transport car parks	5 per cent	5 per cent
Medical and health facilities	6 per cent	4 per cent
Religious buildings and crematoria	Minimum two spaces or 6 per cent, whichever is the greater	4 per cent
Sports facilities	Refer to Sport England Guidance	Refer to Sport England Guidance

10.6.23 Standards for non-residential disabled persons parking are based on a percentage of the total number of parking bays. Careful assessment will therefore be needed to ensure that these percentages make adequate provision in light of the need for disabled persons parking bays by Blue Badge holders. The provision of disabled persons parking bays should be **regularly monitored and reviewed** to ensure the level is adequate and enforcement is effective. All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.

Policy T7 Deliveries, servicing and construction

A Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road.

B Development Plans, Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight strategies. These should seek to:

1) reduce freight trips to, from and within these areas
2) coordinate the provision of infrastructure and facilities to manage freight at an area-wide level
3) reduce road danger, noise and emissions from freight, such as through the use of safer vehicles, sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.

Such strategies should be developed through policy or through the formulation of a masterplan for a planning application.

C To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.

D Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling. The factors to consider in assessing the viability of a railhead include:

- planning history, environmental impact and its relationship to surrounding land use context – recognising that the Agent of Change principle will apply
- location, proximity to the strategic road network and existing/potential markets
- the existing and potential contribution the railhead can make towards catering for freight movements by non-road modes
- the location and availability of capacity at alternative railheads, in light of current and projected capacity and market demands.

E Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.

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F Development proposals for new consolidation and distribution facilities should be supported provided that they do not cause unacceptable impacts on London's strategic road networks and:

1) reduce road danger, noise and emissions from freight trips
2) enable sustainable last-mile movements, including by cycle and electric vehicle
3) deliver mode shift from road to water or rail where possible (without adversely impacting existing or planned passenger services).

G Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

H Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

I At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.

J Development proposals must consider the use of rail/water for the transportation of material and adopt construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.

K During the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

10.7.1 An efficient freight network is necessary to support the function of the city. This policy seeks to facilitate **sustainable freight movement** by rail, waterways and road in London through consolidation, modal shift and promoting deliveries at different times of day and night in order to reduce the impact on road congestion and air quality, and conflict with other users.

10.7.2 Currently many deliveries of non-urgent goods are made, unnecessarily, at congested times of the day. As many as two in every three delivery slots are missed, leading to repeat trips that cause additional congestion and emissions. Many van and lorry trips could be avoided or re-timed if freight activity were better **consolidated**.

10.7.3 The Mayor will work with all relevant partners to improve the **safety and efficiency** of freight across London and support consolidation within and beyond London, as well as the retiming of movements to avoid peak hours. To reduce the pressure on London's streets, developments should provide for deliveries and servicing off-street where possible, and through dedicated loading bays if not. Where loading in the carriageway is unavoidable and the impacts can be made acceptable, it should be designed to minimise the impact on people walking or cycling and other road users. Improved on-site storage can also reduce the need for deliveries during peak hours.

10.7.4 When planning freight movements, development proposals should demonstrate through Construction Logistics Plans and Delivery and Servicing Plans that all reasonable endeavours have been taken towards the use of **non-road vehicle modes**. Where rail and water freight facilities are available, Transport for London's freight tools should be used when developing the site's freight strategy.

10.7.5 Delivery and Servicing Plans should demonstrate how the requirements of the site are met, including **addressing missed deliveries**. Appropriate measures include large letter or parcel boxes and concierges accepting deliveries. Car-free developments should consider facilitation of home deliveries in a way that does not compromise the benefits of creating low-car or car-free environments.

10.7.6 **Construction Logistics and Delivery and Servicing Plans** should be developed in line with TfL guidance and adopt the latest standards around safety and environmental performance of vehicles to ensure freight is safe, clean and efficient. To make the plans effective they should be monitored and managed throughout the construction and operational phases of the development.

10.7.7 **To reduce the road danger associated with the construction of new development** and enable the use of safer vehicles, appropriate schemes such as CLOCS (Construction Logistics and Community Safety) or equivalent and FORS (Fleet Operator Recognition Scheme) or equivalent should be utilised to plan for and monitor site conditions. Development proposals should demonstrate 'good' on-site ground conditions ratings or the mechanisms to reach this level, enabling the use of vehicles with improved levels of driver direct vision. To support the procurement of these vehicles and to minimise road danger, the Mayor has introduced his Direct Vision Standard, which rates Heavy

Goods Vehicles on a star rating from 0 (lowest) to 5 (highest), based on how much the driver can see directly through the cab windows.

Policy T8 Aviation

A The Mayor supports the role of the airports serving London in enhancing the city's spatial growth, particularly within Opportunity Areas well connected to the airports by public transport and which can accommodate significant numbers of new homes and jobs. This should be reflected in relevant Development Plans and other area-based strategies.

B The environmental and health impacts of aviation must be fully acknowledged and aviation-related development proposals should include mitigation measures that fully meet their external and environmental costs, particularly in respect of noise, air quality and climate change. Any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts.

C The Mayor will oppose the expansion of Heathrow Airport unless it can be shown that no additional noise or air quality harm would result, and that the benefits of future regulatory and technology improvements would be fairly shared with affected communities.

D All airport expansion development proposals that would impact on passenger movements through London should demonstrate how public transport and other surface access networks would accommodate resulting increases in demand alongside forecast background growth; this should include credible plans by the airport for funding and delivery of the required infrastructure.

E Development proposals that would lead to changes in airport operations or air traffic movements must take full account of their environmental impacts and the views of affected communities. Any changes to London's airspace must treat London's major airports equitably when airspace is allocated.

F Development proposals should make better use of existing airport capacity, underpinned by upgraded passenger and freight facilities and improved surface access links, in particular rail.

G Airport operators should work closely with airlines, Transport for London and other transport providers and stakeholders to ensure straightforward,

seamless and integrated connectivity and to improve facilities and inclusive access. They should also increase the proportion of journeys passengers and staff make by sustainable means such as rail, bus and cycling, and minimise the environmental impacts of airport servicing and onward freight transport.

H Development proposals relating to general and business aviation activity should only be supported if they would not lead to additional environmental harm or negative effects on health, nor impact on scheduled flight operations. Any significant shift in the mix of operations using an airport – for example, the introduction of scheduled flights at airports not generally offering such flights – should be refused.

I New heliports should be refused, other than for emergency services.

10.8.1 **London's airports form part of a single wider aviation system** whose impacts are felt across local authority boundaries. This policy therefore establishes a strategic approach to aviation within London and provides guidance for decision takers outside of London. The primary focus of the policy is the planning system, but it also serves to inform other processes, such as the development of Airport Masterplans, as well as wider discussions with stakeholders.

10.8.2 London's major airports provide essential connectivity for passengers and freight, support vital trade, inward investment and tourism, generate prosperity, and provide and support significant numbers of jobs. The aviation industry must fully address its **environmental and health impacts**. Government and industry must also recognise local communities' concerns about aviation noise and pollution, consult fully with those affected, and use new technologies to deliver tangible reductions in noise exposure and pollution.

10.8.3 It is important, in the first instance, to **make best use of existing airport capacity**, which fast, frequent, sustainable surface access can support. Opportunity Areas with excellent airport rail connections can serve as airport gateways and be the focus for new development, in turn helping meet London's need for new homes and jobs. Any airport expansion proposals should not be at the expense of London's environment or the health of its residents. Heathrow airport's current operations are already a cause of concern for hundreds of thousands of Londoners, with its significant noise impacts and contribution to illegal levels of air pollution.

10.8.4 Any airport expansion proposals should only be taken forward on the basis that **noise impacts** are avoided, minimised and mitigated, and proposals should

not seek to claim or utilise noise improvements resulting from technology improvements unrelated to expansion. Nor should expansion result in significant numbers of new people being exposed to new or additional noise harm.

10.8.5 Any airport expansion proposals should not worsen existing **air quality** or contribute to exceedance of air quality limits, nor should they seek to claim or utilise air quality improvements resulting from unrelated Mayoral, local or national policies and actions. Airport expansion should also incorporate air quality positive principles to minimise operational and construction impacts.

10.8.6 The Mayor will therefore strongly oppose any expansion of Heathrow Airport that would result in additional environmental harm or negative public health impacts. Air quality gains secured by the Mayor or noise reductions resulting from new technology must be used to improve public health, not to support expansion. The Mayor also believes that expansion at Gatwick could deliver significant benefits to London and the UK more quickly, at less cost, and with significantly fewer adverse environmental impacts. Stansted Airport will, in due course, be able to make better use of its single runway following the raising of its flight cap, alongside appropriate environmental mitigation. London City Airport is working to upgrade its passenger facilities and enhance operational efficiency in conjunction with the introduction of additional environmental mitigation measures and what amounts to a reduction of its maximum permitted number of movements. Luton and Southend airports are also undertaking substantial upgrades of their terminal facilities.

10.8.7 Any airport expansion proposals must show that **surface transport networks** would be able to accommodate the additional trips they would lead to. It will not be sufficient to rely on schemes designed to cater for background growth such as the Elizabeth line, Thameslink and Crossrail 2. If significant airport expansion is to be accommodated sustainably and not lead to additional road traffic movements, this will require major investment by the airport authority and central Government in new infrastructure, particularly rail, in order to deliver the necessary additional capacity and connectivity.

10.8.8 The **aviation impacts on climate change** must be fully recognised and emissions from aviation activities must be compatible with national and international obligations to tackle climate change. The implications for other sectors and other airports must also be fully understood when expansion proposals are brought forward, and aviation greenhouse gas emissions must be aligned with the Mayor's carbon reduction targets.

10.8.9 **Air freight** plays an important role in supporting industry in London and the UK, and the provision of both bellyhold and dedicated freighter capacity should be

an important consideration when plans for airport development in the south east of England are taken forward.

10.8.10 General and business aviation, typically utilising smaller airports, can complement and help sustain London's economy. However, the introduction of **scheduled flights** at such airports can significantly impact local communities, and scheduled flights should therefore normally operate from London's major airports which also tend to have much better surface and public transport networks in place.

10.8.11 The regime governing **helicopter flights** over London is outdated and requires urgent review by the CAA. The noise impacts from helicopters can be considerable and there are also concerns about the local air quality impacts around heliports. An updated regime should take full account of London's spatial growth and changes in technology to reduce noise and other environmental impacts, as well as safety risks. Steps should be taken to reduce helicopters overflying London.

Policy T9 Funding transport infrastructure through planning

A The Mayor will charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance such as Crossrail 2, and potentially other strategic transport infrastructure.

B In consultation with the Mayor, boroughs should identify a package of other strategically-important transport infrastructure, as well as improvements to public realm, along with other funding streams to deliver them.

C Planning obligations (Section 106 agreements), including financial contributions, will be sought to mitigate impacts from development, which may be cumulative. Such obligations and contributions may include the provision of new and improved public transport services, capacity and infrastructure, the expansion of the London-wide cycle networks and supporting infrastructure, and making streets pleasant environments for walking and socialising, in line with the Healthy Streets Approach.

10.9.1 Use of **MCIL** is restricted by regulation to funding **strategic transport infrastructure** in London. The Mayor's first MCIL (MCIL1) was introduced in 2012 to contribute to Crossrail 1 (the Elizabeth line) funding, and was designed as a single rate community infrastructure levy for each London borough,

covering all development other than education and health. Running alongside MCIL1 was a Section 106 contributions scheme which applied to office, retail and hotel developments in central London, the northern part of the Isle of Dogs and around Crossrail 1 stations. In June 2017, the Mayor published proposals for an MCIL2 to contribute to Crossrail 2 funding.[185] This took effect in April 2019, replacing both MCIL1 and the Crossrail 1 Section 106 contributions scheme.

10.9.2 Negotiations on the Crossrail 2 scheme are still underway and there is no agreed funding package at present. Should no funding deal be achievable, the Mayor will apply the MCIL2 proceeds to **fund other strategic transport projects** for which there is a significant funding gap.

10.9.3 **Other transport infrastructure and improvements to public realm** will be necessary to support London's growth. Through Development Plans, boroughs should work with the Mayor to identify current and future requirements and funding streams for transport infrastructure and other measures which support growth and create a high-quality public realm in line with the Healthy Streets Approach.

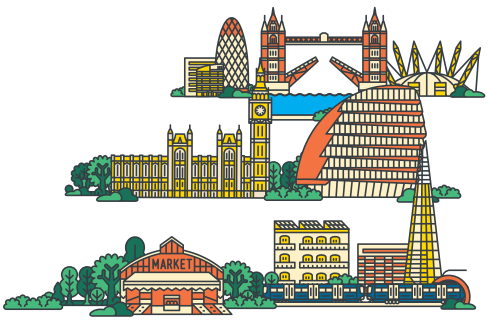
10.9.4 As part of individual development proposals, comprehensive assessment should both inform appropriate levels of mitigation and highlight opportunities for improvements. In some instances, this may include securing **planning obligations** and the development and implementation of strategies to improve the public realm.

10.9.5 Alongside the development of the income streams described above and maximisation of funding that they could generate, the Mayor will work with strategic partners to investigate **new mechanisms** to support the funding of new and improved transport services and infrastructure.

185 https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/mayoral-community-infrastructure-levy

Chapter 11

Funding the London Plan



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Overview

11.0.1 This is an ambitious Plan and delivering it is a significant challenge. The level of growth anticipated in the Plan will require significant investment from both the public and the private sector. London's growth is important for all Londoners, and for the economic prosperity of the UK. It is therefore important that the required long-term investment set out in the London Plan can be funded and delivered.

11.0.2 This chapter sets out a policy framework for viability and planning obligations and estimates the investment in infrastructure needed to deliver the London Plan. A lot of this investment will need to be provided by the public sector. The chapter outlines the gap between currently committed and required public sector funding, and summarises potential options for meeting this funding gap. It also outlines the need for a more supportive regulatory environment where private sector investment is involved.

11.0.3 The most critical areas for investment to achieve the step change in housing delivery that London needs are increased investment in transport infrastructure and fundamental changes to the housing market. There is also a significant need to invest in enabling infrastructure, such as green infrastructure, water, energy, waste, digital connectivity and social infrastructure.

Policy DF1 Delivery of the Plan and Planning Obligations

A Applicants should take account of Development Plan policies when developing proposals and acquiring land. Development proposals should provide the infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan. Where relevant policies in local Development Plan Documents are up to date, it is expected that viability testing should normally only be undertaken on a site-specific basis where there are clear circumstances creating barriers to delivery.

B Where relevant policies in local Development Plan Documents are up to date, if an applicant wishes to make the case that viability should be considered on a site-specific basis, they should provide clear evidence of the specific issues that would prevent delivery, in line with relevant Development Plan policy, prior to submission of an application.

C Where it is accepted that viability of a specific site should be considered as part of an application, the borough should determine the weight to be given to a viability assessment alongside other material considerations, ensuring that developments remain acceptable in planning terms. Viability assessments should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG.

D When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:

1) recognise the role large sites can play in delivering necessary health and education infrastructure; and
2) recognise the importance of affordable workspace, and culture and leisure facilities in delivering good growth.

E Boroughs are also encouraged to take account of the infrastructure prioritisation in Part D in developing their Community Infrastructure Levy Charging Schedule and determining the infrastructure that will be funded through borough CIL.

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11.1.1 The purpose of planning is the delivery of sustainable development, and the statutory basis for this is the plan-led system. The policies in the London Plan have been subject to a viability assessment, proportionate to a Spatial Development Strategy, which has tested the cumulative impact of relevant standards, obligations and requirements to ensure they do not put implementation of the Development Plan at serious risk. Local Development Plan Documents also needed to be informed by viability testing of local sites. Therefore, applicants should take account of all relevant Development Plan policies when forming their proposals and when acquiring land. Land owners should also take account of these requirements when applying for planning permission or selling sites.

11.1.2 The assessment of viability on a site-by-site basis has caused uncertainty, increased land prices and undermined the delivery of Plan objectives. There are inherent difficulties in the assessment of viability at the application stage given input uncertainty and the sensitivity of viability appraisals to small changes in assumptions. There is also a risk that site-specific viability testing is used as a device to reduce planning requirements and enhance commercial returns, even where genuine barriers to delivery do not exist.

11.1.3 To avoid these issues, it is expected that the testing of viability of a specific scheme should only be necessary where there are clear barriers to delivery that would make the delivery of obligations unviable. This will speed up the planning process and increase certainty for applicants and planning authorities, whilst supporting the implementation of planning policies and the delivery of sustainable development.

11.1.4 In setting Local Plan policies and associated guidance, boroughs should consider whether there are circumstances in which it may be acceptable to review the viability of a development on a site-specific basis. These may include circumstances where an applicant is required to provide significant infrastructure improvements to facilitate delivery of a development (beyond the level that would typically be required for the scale of development),[186] or where the value generated by a development would be exceptionally low.

11.1.5 Where relevant policies in local Development Plan Documents are up to date, if an applicant wishes to make the case that viability should be considered on a site-specific basis, they should inform the borough, and Mayor where relevant, prior to submission of the application. Evidence should be provided

186 The need for infrastructure provision to facilitate a site being brought forward for development, or the presence of abnormal development costs, will impact land value and the cost should not necessarily be born through a reduction in planning obligations.

of the specific issues that would prevent delivery in line with relevant Mayoral and borough policies and guidance. The application should be determined in accordance with the Development Plan, with the decision-maker determining the weight to be given to viability alongside other relevant material considerations. This should ensure that proposals remain acceptable in planning terms.

11.1.6 The Mayor's Affordable Housing and Viability SPG sets out detailed guidance on the assessment of viability. Viability should be assessed robustly in line with the Mayor's guidance when undertaken on a site-specific basis.

11.1.7 This policy should inform the development of plan policies, infrastructure planning and planning decisions.

The Funding Gap

11.1.8 London's growth is important for the whole of the United Kingdom. Almost a quarter of the country's output, and around 30 per cent of its economy-related tax take is generated in the capital.[187] For London to continue to grow as set out in this London Plan, Londoners will need access to genuinely affordable homes and good jobs, supported by necessary social infrastructure, transport, utilities and green infrastructure. However, the Mayor currently possesses limited powers to fund affordable housing and infrastructure. There is a significant gap between the public-sector funding required to deliver and support London's growth, and the amount currently committed to London. In many areas of the city, major development projects are not being progressed because of the uncertainty around funding. In the short-term, it is therefore necessary for London and Londoners to have greater certainty over the public funding that central government plans to commit to the city's growth.

11.1.9 Public-sector funding is defined as money raised directly or indirectly through taxing or levying funds from individuals or businesses. The Mayor's current fundraising powers are limited to council tax and business rates, user charges such as transport fares, and third-party contributions such as MCIL. These represent a small proportion of the large number of different taxes levied on London by Government. In 2015/16, London government only had direct control over 5.1 per cent of the tax it raised (council tax and 50 per cent business rates).

11.1.10 Finance is investment sourced from companies or organisations, usually in the form of debt or equity. Where local or national government obtains debt, this can be considered (deferred) funding, as the borrowing is backed by future tax revenue and levies on economic activity.

187 Devolution: a capital idea, London Finance Commission, 2017

11.1.11 The London Infrastructure Plan 2050[188] outlined that the total investment in London's infrastructure (as defined in the plan) required between 2016 and 2050 could reach £1.3 trillion (2014 prices, within a range of £1 trillion to £1.7 trillion). The actual number is likely to be higher given inflation and the revised population estimates underpinning this London Plan.

11.1.12 The research conducted for the London Infrastructure Plan 2050 analysed the likely total required public-sector investment, under a business as usual scenario.[189] Overall, the estimates suggest that the then current level of committed funding (particularly for infrastructure provided by the public sector) would not meet London's growth needs. The research found that the total gap between required public sector investment and committed funds was estimated to be around £3.1 billion per annum. As this estimate was based on 2014 prices and lower predicted population growth, it is now likely to be higher. Where more up-to-date information is available, this is used below.

11.1.13 The Mayor is seeking clarity from Government on the availability of investment for much-needed infrastructure in the capital, and more fundamentally, is seeking further devolution of fiscal powers in line with the recommendations of the London Finance Commission. Because of the scale of the funding gap, the Mayor is also exploring other potential sources of funding, such as land value capture, and looking at how private investors can play a bigger role in investing in the upfront costs of infrastructure. He has also, through this Plan and other strategies, set out how to make more creative and efficient use of existing infrastructure assets, for example, by managing demand for utilities and transport, using new technologies and changing user behaviours.

Infrastructure

11.1.14 To support predicted growth in population, London requires a range of strategic infrastructure to unlock housing and employment growth.

11.1.15 The largest project in the pipeline in terms of cost and scope – Crossrail 2 – will support the delivery of around 200,000 jobs and 200,000 homes, making a significant contribution towards meeting London's housing needs to 2041. However, London needs to deliver some 1.6 million homes over the same period. A large amount of that growth will need to be enabled and supported by

188 London Infrastructure Plan GLA 2015, https://www.london.gov.uk/file/19038/download?token=1Zj5uQZf

189 The method used to calculate required infrastructure investment in the London Infrastructure Plan 2050 is outlined in: The cost of London's long-term infrastructure, Arup, 2014, https://www.london.gov.uk/sites/default/files/gla-the-cost-of-londons-long-term-infrastructure-by-arup.pdf

other infrastructure projects, many of which will take the form of incremental improvements and smaller schemes.

11.1.16 This section outlines what is required to deliver London's housing and planned infrastructure.

Housing

11.1.17 In the London Housing Strategy, the Mayor has set out how he will ensure that all sources of housing supply are utilised, how he intends to use the tools he currently has available to their fullest extent, and what extra powers and resources London would need to achieve a significant and sustainable step change in the delivery of new and affordable homes.

11.1.18 At the core of the London Housing Strategy is an understanding that the current model for homebuilding in the capital faces inherent constraints in terms of how many new homes it can support. These include capacity constraints of major homebuilders, and economic limitations on how quickly market homes can be sold at the prices developers want to achieve. Raising homebuilding toward the targets set out in this London Plan will require the contribution of existing players to be supported, and to be complemented by a significant expansion in the range of delivery models used, and the tenures and types of homes delivered.

11.1.19 In order to accelerate and/or de-risk housing development in the capital the Mayor is already making funding available, and he has secured £4.82 billion to support 116,000 affordable housing starts by 2022. He is also working to secure a significant share of the Government's Housing Infrastructure Fund and has made a number of bids to unlock key housing schemes across London.

11.1.20 Beyond this, the Mayor is making the case to Government for continued and sustained investment in homebuilding and enabling infrastructure. Initial estimates by the GLA indicate that at least £2.7 billion in public capital funding a year is required for affordable housing to help address housing need. This estimate will be revised based on discussions with affordable housing providers and more detailed analysis of the costs of provision.

11.1.21 Beyond his investment and planning powers, the Mayor is also proposing a more hands-on approach to increasing the supply of land for homebuilding. He intends to intervene directly, or support boroughs, housing associations and developers to do so, where land is suitable for new housing but is not coming forward for development.

11.1.22 In relation to publicly-owned land, the Mayor's functional bodies have committed to ensure that land they control is utilised to support additional housing delivery. There is also a significant stock of land in the ownership of other key public-

sector landowners. The Mayor is engaging directly with them to bring forward sites for housing, and is also working with Government to develop a more formal role for the GLA in bringing forward Government-owned land in London earmarked for housing delivery. As a minimum, this role should mirror that operated by Homes England, which directly manages the release of surplus Government landholdings outside London.

11.1.23 As a last resort, statutory powers may be required to bring forward land for development. The Mayor will work with boroughs, Mayoral Development Corporations, TfL, housing associations and developers to utilise statutory land assembly powers, such as Compulsory Purchase Orders, to bring forward housing opportunities. This will include supporting boroughs to make more use of compulsory purchase where appropriate, and the Mayor exercising compulsory purchase powers where a scheme is of strategic significance, or where a borough may be unable or reluctant to act. To support a step-change in the delivery of new and affordable housing, the Mayor is making the case to Government for further reforms of, and resources to support, compulsory purchase, and exploring options for new land assembly models.

11.1.24 The homebuilding industry needs to be diversified to increase capacity and speed up delivery. The Mayor is supporting the Build to Rent sector, which can provide additional supply above what would be delivered through the sale-led housing market. In order to encourage small and medium-sized builders, the Mayor is launching a Small Sites, Small Builders programme, which, alongside changes to CIL and new planning policies, seeks to address some of the barriers faced by smaller builders. The Mayor is also supporting boroughs and housing associations to deliver more homes directly, including by providing investment and lobbying Government for reforms to enable boroughs to build at significantly greater volumes.

11.1.25 Finally, the London Housing Strategy sets out how the Mayor will address the capacity constraints that are holding back the industry. This includes addressing the construction skills crisis by investing in a new Construction Academy Scheme, utilising the devolved Adult Education Budget, ensuring that local labour and apprenticeship opportunities are made more efficient and joined-up, and supporting the substantially greater use of precision manufacturing in building homes across London.

Transport

11.1.26 The Mayor's Transport Strategy sets out the Mayor's priorities for transport, and defines how London's transport infrastructure will be paid for. Delivering the schemes identified in the Mayor's Transport Strategy will require an average capital investment by TfL and others of around £3.3 billion a year. This equates

to around 0.9 per cent of London's Gross Value Added. The level of expenditure envisaged by the strategy is broadly in line with the National Infrastructure Commission's recommendation of an economic infrastructure spend of circa 1.2 per cent of Gross Domestic Product per annum.

11.1.27 Further information on the specific projects detailed in the Mayor's Transport Strategy that support delivery of the London Plan can be found in Table 10.1 in the Transport chapter in this Plan. Significant capital investment will be required to deliver these schemes, which can only be achieved through collaboration between the Mayor and Government, National Rail, London's boroughs and the private sector.

11.1.28 Transport in London is funded through a combination of sources, including:

- Business Rate Retention under Mayoral control, which is replacing existing direct Government grants for operations and new capital investment from 2017-18
- revenue from fares and other 'user pays' sources (e.g. Congestion Charging)
- non-fare sources (e.g. advertising and property)
- contributions from the London boroughs and the private sector, for example developer funding for associated transport investments
- other specific grants
- TfL 'prudential borrowing' against future revenue

11.1.29 In addition, for the Elizabeth line project, there are specific ring-fenced funds (e.g. specific levies such as the Business Rate Supplement and Mayoral CIL). In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG (applicable in central London, the northern part of the Isle of Dogs and within 1km of a Crossrail station for the rest of London). MCIL2 will be used to fund Crossrail 1 (the Elizabeth line).

11.1.30 TfL's operating expenditure, including capital renewals, is primarily reliant on fares and Business Rates Retention funding sources. In the future, additional borrowing will be limited to where the capital-spend results in an increase in future revenues that can service the operating and financing costs. The Elizabeth line, Northern line extension, Overground extension to Barking Riverside and Silvertown Tunnel have identified funding packages and will be delivered in the early years of the Plan. However, most of the schemes listed in Table 10.1 are currently unfunded and additional sustainable funding sources and project-specific deals and grants will be needed alongside contributions from London boroughs and the private sector.

11.1.31 Public sector funding for major infrastructure usually requires the support of the Treasury for direct Government investment or new devolved mechanisms. The Mayor's ability to invest in major transport schemes is therefore highly dependent on his negotiations with Government. The amount of public sector funding allocated to London's required infrastructure is uncertain, and schemes are negotiated on an individual basis which tends to lead to delays.[190] Given that the density of the public transport network correlates strongly with the potential for growth, the significant uncertainty over the funding of many transport schemes reduces confidence in the prospects for growth among all the major stakeholders responsible for building the city, including developers and utilities companies.

11.1.32 While the Mayor continues to promote the devolution agenda in line with the recommendations of the London Finance Commission, he will also continue to look for further creative options to fund required transport infrastructure. The Mayor is considering options for ensuring all beneficiaries of growth contribute to it, and for sweating London's existing assets to deliver efficiency savings. In the long term, however, a fairer and more efficient political settlement should be reached on fiscal devolution. There is good evidence to suggest that fiscal devolution would generate better outcomes for Londoners and also for the rest of the UK. Providing London with the means to control more of its own tax revenues would ensure that London can build the transport infrastructure it needs to unlock development more efficiently, more quickly and with greater certainty.[191]

11.1.33 In addition to the London Finance Commission recommendations, the Mayor believes that Vehicle Excise Duty (VED) should be devolved to TfL to provide revenue for investment in strategic roads in London, the responsibility for the management of which was devolved to TfL in 2000. This would bring investment in London's streets in line with the Government's intention to allocate VED revenue to the English Strategic Road Network from 2020. Powers to change how VED is levied would also provide London with the flexibility to trial new ways of paying for roads, which would be better linked to the impacts vehicles have on them and on London as a whole. Taxation rules should also be reviewed to ensure they incentivise sustainable travel to/from and for work.

190 Devolution: a capital idea, London Finance Commission, 2017

191 Transport Investment Strategy, DfT, 2017; Devolution: a capital idea, London Finance Commission, 2017; The Political Economy of Infrastructure in the UK, Coelho, M. and Ratnoo, V, 2014; National Infrastructure Plan, HM Treasury, 2014

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Enabling Infrastructure

Schools

11.1.34 There is a growing need for school places in London. Central government provides the majority of the capital funding to create school places and to carry out capital maintenance and repair work to existing school buildings,[192] supplemented by capital contributions from London boroughs. An indicative survey by the GLA across the academic years 2011/12 and 2012/13 suggests that capital funding from Government represented around one third of the funding required. This analysis suggests that London will need in the region of £11 billion to 2050 to fund new primary and secondary school places and an additional £12 billion to undertake renewals on both new and existing school facilities.

11.1.35 This investment will need to be made by increasing Government contributions and from sources raised locally, such as through CIL or Section 106 contributions. A wide range of new sources of funding is likely to be difficult to access without providing London government with greater control and freedom over its local tax base. Further innovation and efficiencies will also be required to bring down costs.[193]

Health Facilities

11.1.36 The demand for health services in London is increasing due to a growing and ageing population and an increase in complex and long-term health conditions. As described in paragraphs 5.2.1 to 5.2.9 of this Plan, the NHS has set out the need to undertake a higher proportion of healthcare in community rather than hospital settings. However, many hospital sites contain old, poor-quality stock and there is a need for both replacement and maintenance. Investment is also needed in the workforce and digital technology to deliver service change.

11.1.37 Across London, developer contributions are used to fund the capital costs of new or expanded primary and community care facilities in order to meet the increasing demand for services which arises from population growth in new developments. Boroughs should use the London Healthy Urban Development Unit Planning Contributions Model (HUDU Model) to calculate the capital cost of the additional health facilities required to meet the increased demand. Boroughs should also work with Clinical Commissioning Groups and NHS England to

192 Through the Department for Education's Devolved Formula Capital funding

193 The cost of London's long-term infrastructure, Arup, 2014, https://www.london.gov.uk/sites/default/files/gla-the-cost-of-londons-long-term-infrastructure-by-arup.pdf

determine what investment is required by monitoring housing and population growth, keeping infrastructure plans up to date and working together to identify and develop projects towards which Section 106 and CIL contributions could be used.

11.1.38 Section 106 in-kind contributions can be used to support the provision of new health facilities, particularly in Opportunity Areas where there is little or no existing infrastructure. Examples of in-kind contributions include: transfer of land to provide new primary and community care facilities; construction and fit-out of new health facilities; and provision of 'shell and core' space at peppercorn rent. Funding sources for health buildings also include direct capital from central government and private funding through a variety of public/private joint ventures. A specific fund for Primary care estate, the Estates and Technology Transformation Fund (ETTF), is in the second of a four-year programme (to 2020).

11.1.39 London's Sustainability and Transformation Plans (STPs) were published in October 2016 to set out how health and care services would evolve and become financially sustainable over the 5-year period to 2020/21. The plans outlined a requirement to spend £4.8 billion on existing health infrastructure in London just to keep it operationally functional. Further capital investment in NHS infrastructure of £2.1 billion is needed to meet the costs of transforming health services in London and accommodating population growth. Therefore, a total 5-year investment of £6.9 billion is required.

11.1.40 ETTF and developer contributions represent only a relatively small proportion of the capital funding required, so additional sources need to be identified. The London Health and Care Devolution Memorandum of Understanding offers significant opportunities to address health and care estate challenges. These include innovative approaches to realising value from underused and unused NHS land and buildings; working more collaboratively with the Mayor and London's boroughs; and taking the One Public Estate approach to health and care developments. The London Estates Board and London Estates Delivery Unit aim to support the effective delivery of local and sub-regional estates plans, including more efficient estate utilisation. This will better meet the health and care needs of Londoners now and in the future.

Utilities

11.1.41 This Plan assumes that all regulated utilities infrastructure necessary to support growth will be delivered by the statutory providers and network operators. The London Infrastructure Plan 2050 suggests that energy and water infrastructure will require £148 billion and £46 billion of investment in London respectively over the period. Investment in energy and water infrastructure is usually funded by providers through user charges. Spend on new assets and operating costs

are agreed through negotiations between the provider and regulator. These plans are then set out at the beginning of the regulatory price-control period in the provider's business plan. Because capital expenditure is funded through user charges, utilities companies typically borrow to fund the upfront costs of investment.

11.1.42 The exception to this approach for utilities infrastructure is heat network infrastructure, the pipework that carries hot water connecting sources of low-cost, low-carbon energy to homes and business to meet their space heating and hot water needs. Heat networks are an emerging class of infrastructure recognised by both the Mayor and the Government as being essential in meeting climate change targets. Heat networks are not a regulated undertaking and therefore not subject to the same restrictions or benefits (in terms of powers) as statutory undertakers. The Mayor is exploring how to increase the rate of their development in London, which will require central government to create a level playing field for the treatment of district heating networks compared to other statutory utilities regarding access rights and business rates.

11.1.43 The scale of growth in London will require significant capital investment in water and energy infrastructure. Investment ahead of demand will be required to ensure the utilities are available when sites are developed. It can also realise significant efficiency savings for all parties involved in a development. The Mayor is working with providers and regulators to ensure the regulatory regime supports investment at the right time.

Flood Risk Management

11.1.44 The Environment Agency and Lead Local Flood Authorities are responsible for the identification and delivery of flood risk management schemes. Funding is provided by Government as Grant in Aid, through local levies and partnership funding sources, distributed through the Regional Flood and Coastal Committee (RFCC). It is also important to consider how direct beneficiaries of flood reduction projects can contribute to the costs of these projects.

Digital Infrastructure

11.1.45 The London Infrastructure Plan 2050 estimates that £8 billion will be required to provide the digital connectivity infrastructure London needs. As in the case of energy and water investment, new digital connectivity infrastructure is paid for upfront through finance or private equity investment backed by user charges. In general, decisions on where to invest in infrastructure are determined on a demand-led or network capability and capacity basis. There are also regulatory obligations for coverage, and infrastructure roll-out decisions are also dependent on technology delivery type. Increasing demand, as business

activities and people's lifestyles become more dependent on faster broadband, means that, as with other utilities, the regulatory regime must support investment ahead of demand. This should take account of the fast-changing nature of digital technology.

Green Infrastructure

11.1.46 The city's green infrastructure provides a wide range of benefits and services that generate significant economic value in a cost-effective way. The Mayor, in partnership with the National Trust and Heritage Lottery Fund, has published a natural capital account that clearly demonstrates this.[194]

11.1.47 Provision of green infrastructure has traditionally been the responsibility of public authorities and various public or third-sector land-management bodies, but increasingly, a number of private sector actors (including utility companies, developers and businesses) are contributing to delivery. This is especially the case in the built environment where green roofs and walls, street trees and sustainable drainage systems are being delivered and maintained by private land-owners.

11.1.48 The funding model for green infrastructure differs from that of other enabling infrastructure in that there are rarely obvious primary revenue streams (such as fares, bills or charges) that relate the provision of the service to the cost of managing, maintaining and upgrading the infrastructure.

11.1.49 In an attempt to address the problem of not properly valuing the services and benefits of green infrastructure, the Government has committed to including natural capital accounts in the UK Environmental Accounts by 2020. This is to ensure that the economic benefits of green infrastructure can be understood alongside other key indicators of economic performance. The Office for National Statistics has been charged by Government with developing a roadmap to enable this.

11.1.50 This re-framing of our understanding of the economic value of green infrastructure makes a considerable difference to decisions about the allocation of existing resources. For example, the willingness of developers to integrate green infrastructure into developments rather than considering the provision of green space as simply a condition of planning.

11.1.51 The majority of funding for green infrastructure is still likely to come from public sector budgets for the management and maintenance of parks and green spaces. However, future funding may be derived from a wider range of public sector sources in recognition of the contribution green infrastructure makes to

194 Natural Capital Account for London's Public Green Spaces, Vivid Economics, 2017

improving public health, enhancing resilience and providing more sustainable transport options.

11.1.52 Nevertheless, new funding streams will need to be identified in order to improve existing parks and green spaces and to create new green infrastructure in those areas where it is deficient. This might include offsetting funds, new environmental levies to address specific challenges (such as surface water flooding), and new devolved mechanisms. There is also an opportunity to explore new mechanisms to ensure that those who benefit from land value uplift resulting from good-quality green infrastructure contribute to its maintenance and improvement.

Waste and Circular Economy Infrastructure

11.1.53 As London's population increases so will the amount of waste it produces both at home and in the workplace. Continuation of the current linear economy – where we take resources, make products, use them until the end of their lifetime and then dispose of them – would require significant investment in additional waste infrastructure to cope with this increase.

11.1.54 Transitioning to a circular economy, however, would bring about a net annual benefit of £7 billion by 2036 according to the London Waste and Recycling Board Circular Economy Route Map.[195] This is because the circular economy is restorative and regenerative by design. Relying on system-wide innovation, it aims to redefine products and services to design out waste, while minimising negative impacts. Underpinned by a transition to renewable energy sources, the circular model builds economic, natural and social capital.

11.1.55 Business will lead the transition to a circular economy, often through start-ups identifying a market opportunity. The investment required by these businesses will be a mixture of venture capital and equity, some of which will come from commercial investors but some of which will need to come from the public and not-for-profit sectors. The GLA and London Waste and Recycling Board have an identified budget to invest in circular economy businesses on commercial terms, but accelerating the transition to a circular economy will require more investment.

Cultural Infrastructure

11.1.56 There is growing evidence of the continuing loss of cultural infrastructure in the capital. By 2019, London is projected to lose 35 per cent of its affordable creative workspace, 35 per cent of its music venues, 58 per cent of LGBT+

195 London The Circular Economy Capital, London Waste and Recycling Board, 2015

and night-time venues and 25 per cent of its pubs. This is of concern because cultural infrastructure is important to local communities, to the tourism industry and to sustaining the creative economy, which is a source of significant employment growth and worth £47 billion to London's economy.

11.1.57 London will require significant investment to reverse the loss of these valued assets and to develop new production hubs, for example as part of the sub-regional vision for a Thames Estuary Production Corridor. In addition, investment in London's cultural and heritage assets will be needed to maintain the capital's position as a world-leading creative capital and tourist destination, with four out of five visitors stating that culture and heritage are the main reason for their visit.

11.1.58 To protect and develop London's cultural infrastructure, investment will need to be raised locally, including from CIL and Section 106 contributions, where appropriate. The Mayor will also explore other sources of investment including philanthropic funding. Additional sources of funding will also be required, but will be difficult to access unless London is given greater control over its local tax base.

Potential Options for Raising the Required Funding

Fiscal Devolution

11.1.59 Delivering London's required strategic infrastructure and housing demands significant investment of public sector funding. Because the UK possesses a comparatively centralised distribution of fiscal powers, substantial proportions of the total cost of strategic infrastructure tend to be funded through fiscal transfers, issued by the Treasury. This often leads to significant uncertainty over the outcome of a proposed project, and delays in funding being agreed. In recognition of the challenges this can create for industry, businesses and Londoners, the Mayor is committed to ensuring that London has more control over its own resources.

11.1.60 London is the world's largest financial centre, and has one of the largest metropolitan GDPs. It is a vital component of the UK economy, driving growth across the country. London contributes significant amounts of the UK's tax revenue and is a net contributor. In 2015/16 it contributed £136.7 billion, which was more than the total public expenditure devoted to London that year (£110 billion), generating a net fiscal contribution of £26.7 billion. To ensure that London continues to contribute in this way to the national economy, it is vital that the capital's required infrastructure and housing is delivered to support the city's economic growth, and ensure it remains a pleasant and healthy place to live, work and visit.

11.1.61 The Mayor believes that fiscal devolution is required to help ensure that London can deliver this vital infrastructure efficiently and to budget. The London Finance Commission report published in 2017 sets out the options and rationale for devolution. Devolution to London would allow the city's government to develop bespoke policy for its citizens and manage its budget efficiently across areas of policy, rather than be tied to a mix of funding streams channelled through government departments and other agencies.

11.1.62 The London Finance Commission recommended the full devolution of property taxes, including council tax, business rates and stamp duty, as well as permissive powers to develop new mechanisms, subject to consultation. This would allow for the development of a consistent approach with Section 106 payments and the Mayoral and borough CIL. This devolved approach would help London to deliver major transport, and other capital investments, as well as taking the lead in solving its own housing problems.

11.1.63 The success of the UK economy depends increasingly on the success of our major cities. The Mayor recognises fiscal devolution as a national agenda, rather than a priority exclusively for Londoners, and is working with combined authorities across the UK and with newly appointed Metro Mayors, to promote devolution across the country.

Sharing in Land Value Uplift

11.1.64 Successful infrastructure systems benefit everyone in the city, and so it is logical that it is not direct users alone who fund them. All beneficiaries, such as road users, businesses, and home owners should contribute to funding transport and other infrastructure according to the benefits they receive, the external costs their use of it generates – such as congestion and air pollution – and their ability to pay.

11.1.65 Major transport investment can significantly increase the value of land, particularly if it is close to a train station or transport hub. Land value capture is a term used to describe the use of this increase in land value to fund investment in public services, such as transport. In 2017 the Government announced a taskforce[196] to investigate a new way of paying for infrastructure projects, such as new public transport, including via land value capture. The Government asked the taskforce to look at the so called 'Development Rights Auction Model' of

196 The taskforce is led by the Ministry of Housing, Communities and Local Government and the Mayor of London's Office, and includes HM Treasury, the Department for Transport, TfL and London Councils.

land value capture. TfL prepared a report, which studied the model in detail, and found that it would be unlikely to raise significant funding in London.

11.1.66 There are a range of other infrastructure investments and interventions that can increase the value of land, and other options for capturing land value uplift. The Mayor will continue to work with government to explore all avenues for ensuring Londoners receive the vital infrastructure required to support growth.

Conclusion

11.1.67 Through this Plan, the Mayor is determined to tackle the housing crisis and support London's continued growth in a sustainable and inclusive way. This chapter has set out how the funding gap must be met if the infrastructure to support growth is to be planned and delivered at the right time. The step change in housing delivery that London needs cannot happen without it. The Mayor needs new fiscal tools to fund this infrastructure. Where it can be funded privately, he requires a supportive regulatory regime so that it can be provided when needed.

11.1.68 A successful London economy benefits the whole of the UK, so there is a strong case for devolving control over resources to the Mayor to enable greater investment in infrastructure. Local, city-wide, and central government need to work together with the private sector to identify creative and innovative ways to deliver the infrastructure in London that will unlock growth and new homes.

Chapter 12

Monitoring

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Policy M1 Monitoring

A The implementation of the London Plan will be kept under review using, in particular, the Key Performance Indicators set out in Table 12.1 and the Annual Monitoring Report.

12.1.1 It is important to have a succinct set of **Key Performance Indicators** (KPIs) and measures against which to monitor the successful implementation of this Plan's policies. The KPIs support key Mayoral commitments and priorities in a structured way. They seek to assess yearly progress and to build meaningful time series. The measure for each indicator shows the direction and scale of change that the London Plan policies are seeking to achieve. They do not themselves represent additional policy.

12.1.2 Performance against the KPIs will be reported in the statutory **Annual Monitoring Report** (AMR) to be published by the Mayor each Spring. The KPI figures will be accompanied by commentary that may also include additional corresponding performance figures. The AMR will also monitor a range of other data that is relevant to understanding the implementation of the Plan in the wider context, and to inform future reviews of the Plan.

Table 12.1 - Key Performance Indicators and Measures

Housing	
KPI	Supply of **new homes**
Measure	Increase in the supply of new homes over the period (monitored against housing completions and the net pipeline of approved homes), towards meeting the 66,000 net additional homes needed each year up to March 2029.
KPI	Supply of **affordable homes**
Measure	Positive trend in percentage of planning approvals for housing that are affordable housing (based on a rolling average).

Economy	
KPI	Supply of **office capacity**
Measure	Pipeline of planning permissions for office floorspace is at least three times the average office floorspace construction started over the previous three years.
KPI	Provision of **affordable workspace**
Measure	Positive trend in affordable B1 workspace as a share of total B1 floorspace in planning approvals (based on a rolling average).
KPI	Availability of **industrial land**
Measure	No overall net loss of industrial and warehousing floorspace in London (B1c, B2 and B8) in designated industrial locations (based on a rolling average).
Environment	
KPI	Protection of **Green Belt and Metropolitan Open Land**
Measure	Harm to the Green Belt and Metropolitan Open Land prevented through the referred application process.
KPI	**Carbon emissions** through new development
Measure	Average on-site carbon emission reductions of at least 35% compared to Building Regulations 2013 for approved referable development applications.
Transport	
KPI	**Modal share**
Measure	Increasing mode share for walking, cycling and public transport (excluding taxis) towards the target of 80% by 2041.
Health	
KPI	Londoners engaging in **active travel**
Measure	Positive trend in provision of cycle parking (based on a rolling average) to support the target of all Londoners doing two ten-minute periods of active travel a day by 2041.

Air Quality	
KPI	**Air quality**
Measure	Positive trend in approved referable development applications demonstrating that they meet at least air quality neutral standard for emissions (based on a rolling average).
Heritage	
KPI	Impact of development on London's **heritage**
Measure	Positive trend in the reduction of harm and/or an increase in benefits to designated heritage assets in approved referable development applications (based on a rolling average).
Culture	
KPI	Provision of **cultural infrastructure**
Measure	No net loss of culture venues and facilities* (based on a rolling average).

* Suggested to include: A4 use (public houses), D1 use (museums, public libraries, public halls, exhibition halls), D2 use (cinemas, concert halls, bingo halls, dance halls, other areas for indoor and outdoor sports or recreations not involving motorised vehicles or firearms), Sui Generis (theatres, nightclubs, casinos).

12.1.3 The **Good Growth** objectives in Chapter 1 set out the Mayor's vision for the capital: London should be socially and economically inclusive and environmentally sustainable. The topic and spatially-specific policies of the Plan contribute to the delivery of the Good Growth objectives. They will be monitored through a combination of these KPIs and other performance measures, which will be set out in the AMR.

12.1.4 A comprehensive set of **complementary and more detailed data** and performance measures will sit alongside the KPIs in the AMR. Some of the KPIs from the previous Plan will be included and those time series therefore retained. Some policy areas are not covered by KPIs, but measuring trends for those areas covered by the Plan – including key planning-related social, economic and environmental issues - is important. Additional measures to be included in the AMR will be explored over time and this will be informed by engagement with relevant stakeholders in the process.

12.1.5 A new set of indicators measuring the **performance of referable planning applications** in terms of compliance with important policy issues is also being

investigated. This could include for example if a design review has been carried out. The performance of referable schemes represents the most direct measure of the performance of the Plan.

12.1.6 The **AMR is not the only tool** to monitor London's performance. It is complemented by the monitoring arrangements for the other Mayoral Strategies and other thematic reports including, for example, the Energy Monitoring Report and TfL's Travel in London Report. Their indicators do not need to be duplicated in the AMR.

12.1.7 However, AMRs will include commentary on some **contextual indicators** that are influenced largely by factors outside the planning system. This includes, for example, outcomes that are measured via other Mayoral Strategies, but which provide a better contextual understanding of potential effects of the policies of the Plan. All quantitative measures mentioned in this Plan will be referenced in the AMR.

12.1.8 For specific geographies such as Opportunity Areas (Policy SD1) and Strategic Areas for Regeneration (Policy SD10), tailored monitoring and investigations will be carried out to inform the implementation of the area-specific policy objectives.

Annex 1

Town Centre Network

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Town Centre Network and Future Potential Network Classification

Table A1.1 classifies London's larger town centres into five categories: International, Metropolitan, Major and District centres, as well as CAZ retail clusters. In addition, there are Local and Neighbourhood centres throughout London, which may be designated in Local Plans. This classification provides a hierarchy, recognising the different size and draw of town centres. Table A1.1 also identifies those centres that may have the potential to be re-classified in the future (see Policy SD8 Town centre network). The different roles in the network are:

- **International centres** – London's globally-renowned retail and leisure destinations, providing a broad range of high-order comparison and specialist shopping, integrated into environments of the highest architectural quality and interspersed with internationally-recognised leisure, culture, heritage and tourism destinations. These centres have excellent levels of public transport accessibility.
- **Metropolitan centres** – serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings.
- **Major centres** – typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.
- **District centres** – distributed more widely than Metropolitan and Major centres, providing convenience goods and services, and social infrastructure for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000–50,000 sqm of retail, leisure and service floorspace. Some District centres have developed specialist shopping functions.
- **CAZ retail clusters** – significant mixed-use clusters located within the Central Activities Zone, with a predominant retail function and, in terms of scale, broadly comparable to Major or District centres. See Policy SD4 The Central Activities Zone (CAZ).
- **Local and Neighbourhood centres** – typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services. They may include a small supermarket (typically up to around 500 sqm), sub-post office, pharmacy, laundrette and other useful local services. Together with District

centres they can play a key role in addressing areas deficient in local retail and other services. This includes locally-identified CAZ retail clusters.

Figure A1.1 - Future Potential Changes To The Town Centre Network

Future Potential Changes to Town Centre Network

- International
- Metropolitan
- Major
- District
- CAZ Retail Clusters

Source: GLA Planning

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Night-time Economy Classification

These centres have a strategic night-time function involving a broad mix of activity during the evening and at night, including most or all of the following uses: culture, leisure, entertainment, food and drink, health services and shopping. (See Policy HC6 Supporting the night-time economy) and Figure 7.6 for details. They are classified into three categories:

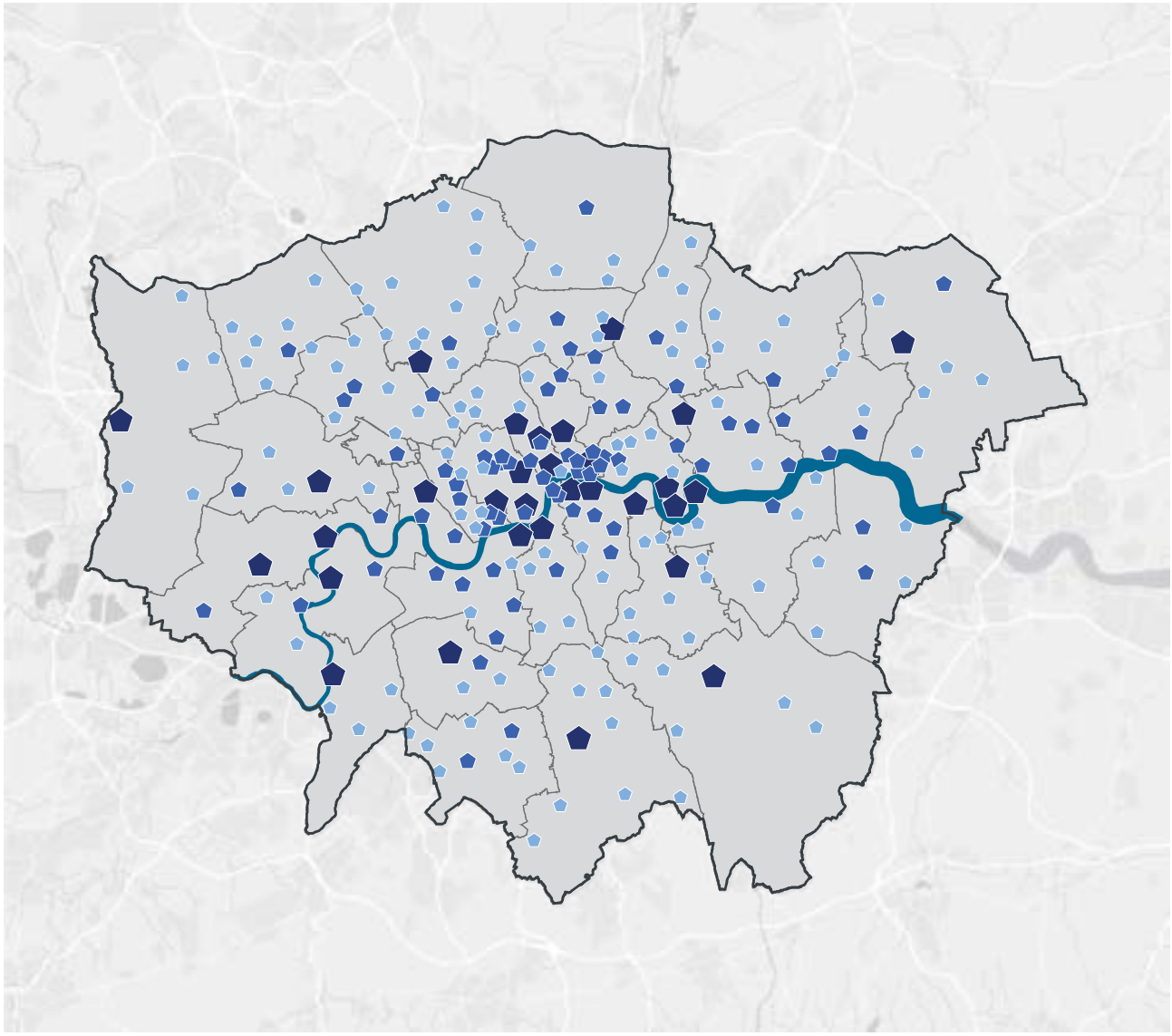
- NT1 – Areas of international or national significance
- NT2 – Areas of regional or sub-regional significance
- NT3 – Areas with more than local significance

Commercial Growth Potential

Table A1.1 provides strategic guidance on the broad future direction envisaged for the International, Metropolitan, Major and District centres and CAZ retail clusters including their possible potential for commercial growth (uses falling within the A, B, D and SG Use Classes). Three broad categories of future commercial growth potential have been identified:

- **High growth** – includes town centres likely to experience strategically-significant levels of growth with strong demand and/or large-scale retail, leisure or office development in the pipeline and with existing or potential public transport capacity to accommodate it (typically PTAL 5-6).
- **Medium growth** – includes town centres with moderate levels of demand for retail, leisure or office floorspace, and with physical and public transport capacity to accommodate it.
- **Low growth** – town centres that are encouraged to pursue a policy of consolidation by making the best use of existing capacity, either due to (a) physical, environmental or public transport accessibility constraints, or (b) low demand.

Figure A1.2 - Town Centre Growth Potential – Commercial



Town Centre Network
Commercial Growth Potential

- High
- Medium
- Low

Source: GLA Planning

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Residential Growth Potential

All town centres have potential for residential growth, either within or on the edge of the town centre. Table A1.1 provides strategic guidance for the relative potential for residential growth for the International, Metropolitan, Major and District centres and CAZ retail clusters, indicating whether they would be likely to be able to accommodate high or medium levels of residential growth, or incremental residential development. This is a broad strategic-level categorisation that has been informed by the SHLAAA[A1] and Town Centre Health Check, and takes into consideration the potential for impacts on heritage assets. Boroughs should be planning proactively to seek opportunities for residential growth in and around town centres, in particular using the mechanisms set out in Policy SD7 Town centres: development principles and Development Plan Documents, informed by detailed assessments of town centre capacity and complementing approaches set out in town centre strategies.

A1 https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-full-review/strategic-housing-land-availability

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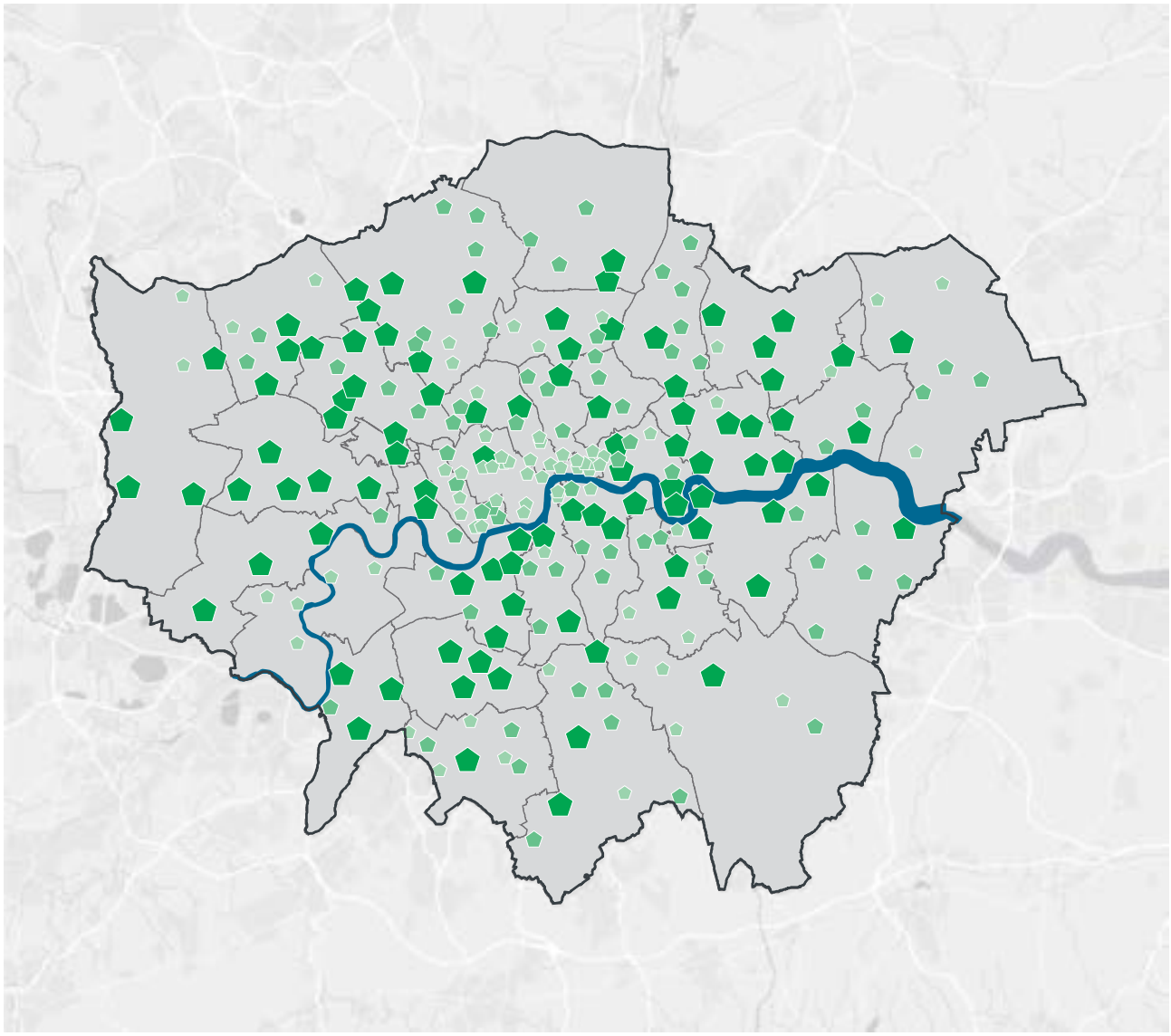
Figure A1.3 - Town Centre Growth Potential – Residential



Town Centre Network
Residential Growth Potential

- High
- Medium
- Incremental

Source: GLA Planning

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Office Guidelines

Table A1.1 and Figure A1.4 set out those town centres where specific approaches to offices are recommended, as informed by the London Office Policy Review[A2] **and borough evidence**.

CAZ – Centres in the Central Activities Zone with a significant office function. See Policy SD4 The Central Activities Zone (CAZ) and Policy SD5 Offices, other strategic functions and residential development in the CAZ.

CAZ Office Satellite – The Northern Isle of Dogs (NIOD) currently functions as a CAZ satellite in terms of office provision. Stratford and Old Oak Common will share the hyper-connectivity of the CAZ and could have the potential to function as future CAZ satellites, should the demand for office floorspace exceed the capacity of the CAZ and NIOD.

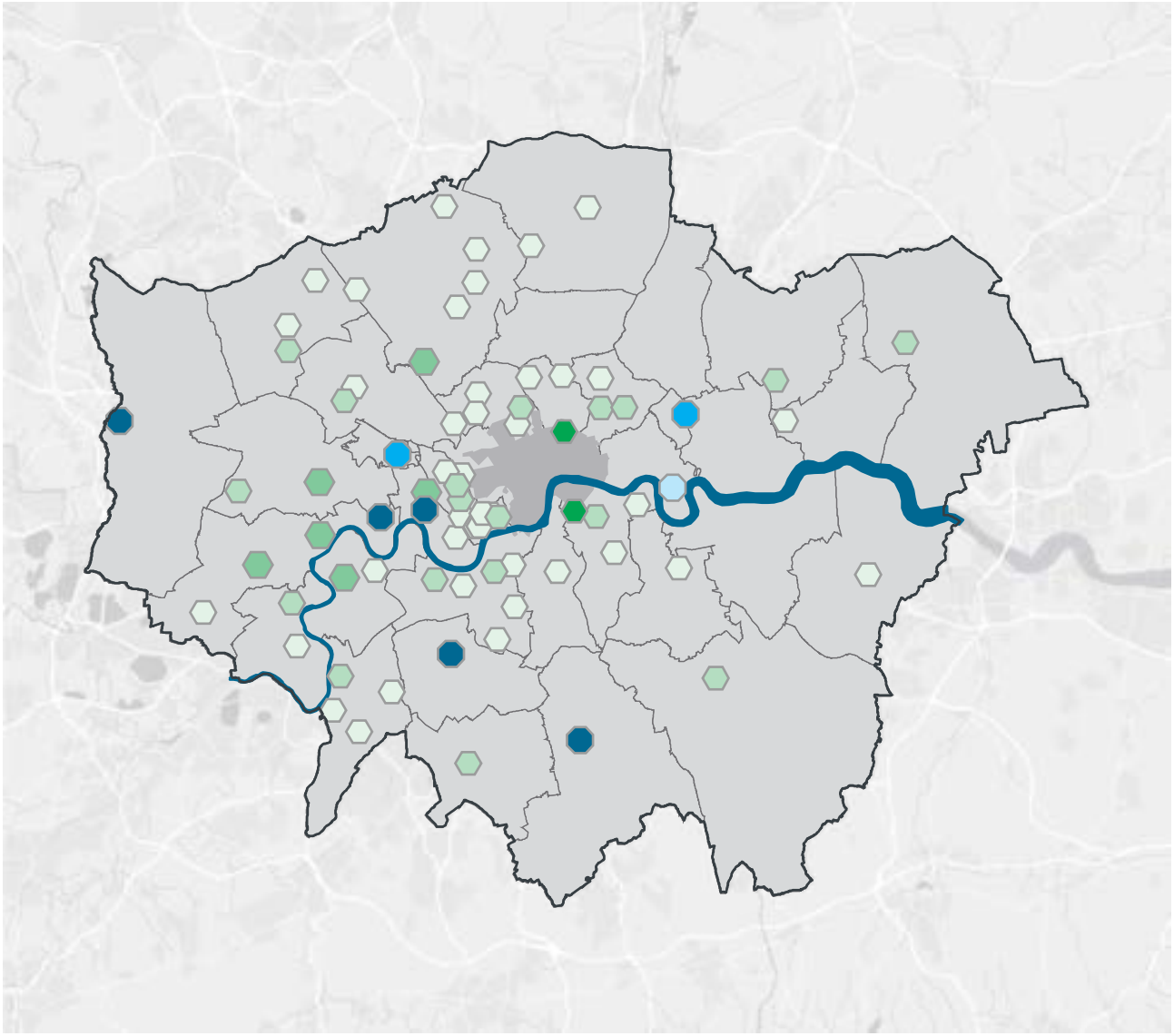
A. **Speculative office potential** – These centres have the capacity, demand and viability to accommodate new speculative office development.

B. **Mixed-use office potential** – These centres have the capacity, demand and viability to accommodate new office development, generally as part of mixed-use developments including residential use.

C. **Protect small office capacity** – These centres show demand for existing office functions, generally within smaller units.

A2 https://www.london.gov.uk/what-we-do/planning/london-plan/london-office-policy-reviews

Figure A1.4 - Town Centre Office Guidelines



Town Centre Network
Office Guidelines

- A/ CAZ Satellite
- A/potential CAZ satellite
- A
- A/B and part CAZ
- A/B
- B
- C
- CAZ

Source: GLA Planning

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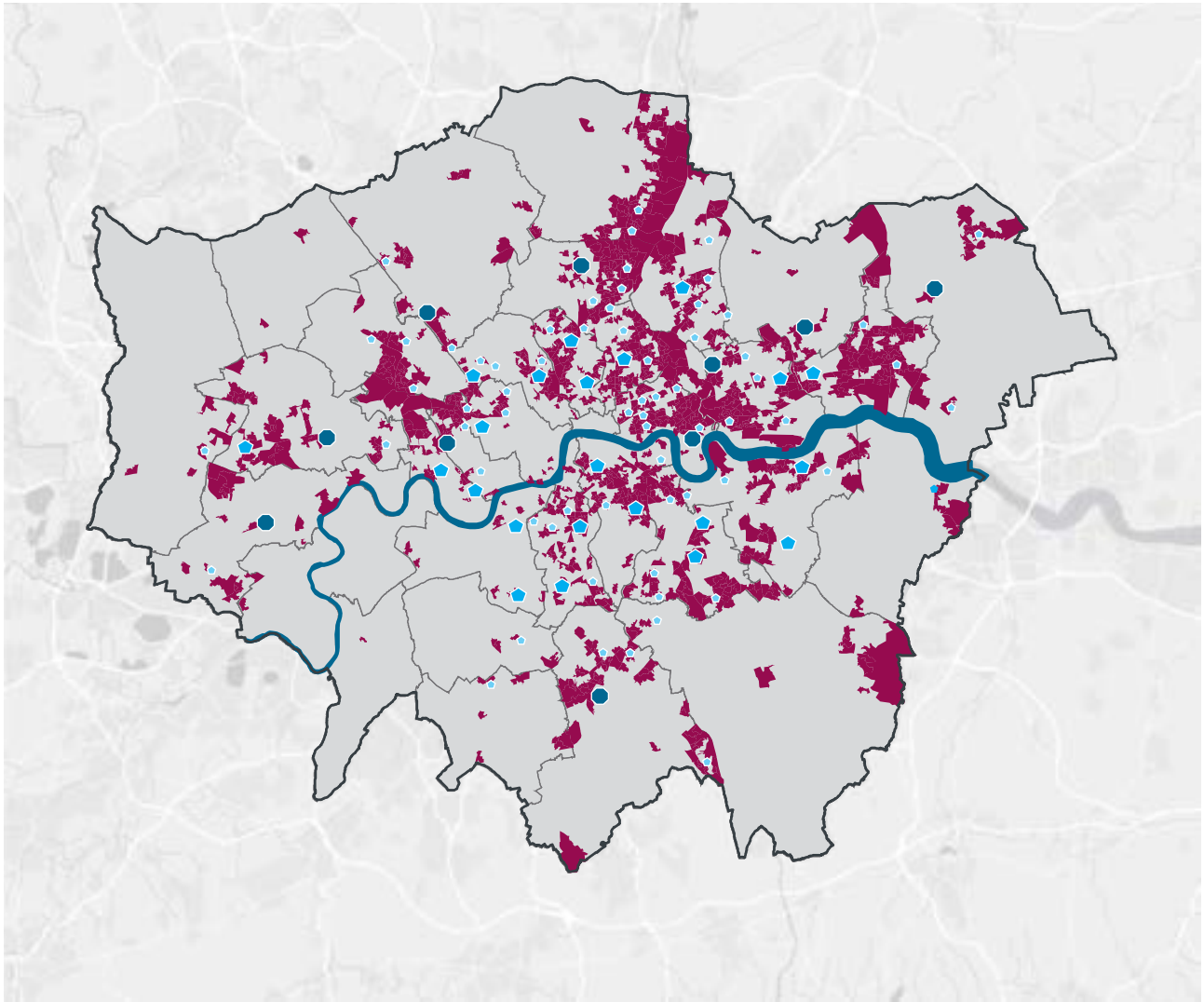
Figure A1.5 - Town Centres Within Areas For Regeneration



Strategic Areas for Regeneration

- Strategic areas for regeneration

Town Centres in Strategic Areas for Regeneration

- Metropolitan
- Major
- District

Source: GLA Planning and DCLG

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Table A1.1 - Town Centre Network

Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
1	West End	Westminster/ Camden	International		NT1	High	Incremental	CAZ	
2	Knightsbridge	Kensington & Chelsea/ Westminster	International		NT2	High	Incremental	CAZ	
3	Bromley	Bromley	Metropolitan		NT2	High	High	B	
4	Croydon	Croydon	Metropolitan		NT2	High	High	A	Yes
5	Ealing	Ealing	Metropolitan		NT2	High	High	A/ B	Yes
6	Shepherds Bush	Hammersmith & Fulham	Metropolitan	International	NT2	High	High	A/ B	Yes
7	Wood Green	Haringey	Metropolitan		NT2	Medium	High		Yes
8	Harrow	Harrow	Metropolitan		NT2	Medium	High	B	
9	Romford	Havering	Metropolitan		NT2	High	High	B	Yes
10	Uxbridge	Hillingdon	Metropolitan		NT2	High	High	A	
11	Hounslow	Hounslow	Metropolitan		NT2	High	High	A/ B	Yes
12	Kingston	Kingston	Metropolitan		NT2	High	High	B	
13	Stratford	Newham	Metropolitan	International	NT2	High	High	A/ future potential CAZ satellite	Yes
14	Ilford	Redbridge	Metropolitan		NT2	Medium	High	B	Yes
15	Sutton	Sutton	Metropolitan		NT2	Medium	High	B	Yes
16	Canary Wharf	Tower Hamlets	Metropolitan		NT2	High	High	A/ CAZ satellite	
17	Barking	Barking & Dagenham	Major		NT3	Medium	High	C	Yes
18	Edgware	Barnet/ Harrow	Major			Low	High	C	
19	Bexleyheath	Bexley	Major		NT2	Medium	Medium	C	
20	Wembley	Brent	Major	Metropolitan	NT1	Medium	High	B	
21	Kilburn	Brent/ Camden	Major		NT3	Low	Medium	C	Yes
22	Orpington	Bromley	Major			Low	Medium		
23	Camden Town	Camden	Major		NT1	High	Medium	C	Yes
24	Southall	Ealing	Major		NT3	Medium	High	B	Yes
25	Enfield Town	Enfield	Major			Medium	Medium	C	

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Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
26	Eltham	Greenwich	Major			Low	High		Yes
27	Woolwich	Greenwich	Major	Metropolitan	NT3	Medium	High		Yes
28	Dalston	Hackney	Major		NT2	Medium	High	B	Yes
29	Hackney Central	Hackney	Major		NT2	Medium	Medium	B	Yes
30	Fulham	Hammersmith & Fulham	Major		NT2	Medium	Medium	C	Yes
31	Hammersmith	Hammersmith & Fulham	Major		NT2	Medium	High	A	Yes
32	Chiswick	Hounslow	Major		NT3	Medium	Medium	A	
33	Angel	Islington	Major		NT2	High	Medium	A/ B and part CAZ	Yes
34	Nags Head	Islington	Major		NT3	Medium	Medium		Yes
35	Kensington High Street	Kensington & Chelsea	Major		NT2	Medium	Incremental	B	
36	King's Road (east)	Kensington & Chelsea	Major		NT2	Medium	Medium	B	
37	Brixton	Lambeth	Major		NT2	Medium	Medium	C	Yes
38	Streatham	Lambeth	Major		NT2	Low	Medium		Yes
39	Catford	Lewisham	Major		NT3	Low	High		Yes
40	Lewisham	Lewisham	Major	Metropolitan	NT3	High	High	C	Yes
41	Wimbledon	Merton	Major		NT2	High	High	A	
42	East Ham	Newham	Major			Medium	High		Yes
43	Richmond	Richmond	Major		NT2	High	Incremental	A/ B	
44	Canada Water	Southwark	Major		NT3	High	High	C	Yes
45	Elephant and Castle/ Walworth Road	Southwark	Major		NT2	Medium	High	A/ B and part CAZ	Yes
46	Peckham	Southwark	Major		NT2	Medium	Medium	C	Yes
47	Walthamstow	Waltham Forest	Major		NT2	Medium	High		Yes
48	Clapham Junction	Wandsworth	Major		NT2	Medium	High	B	Yes
49	Putney	Wandsworth	Major		NT3	Medium	Medium	B	

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Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
50	Tooting	Wandsworth	Major		NT3	Medium	High	C	Yes
51	Wandsworth	Wandsworth	Major		NT3	Medium	High	C	
52	Queensway/ Westbourne Grove	Westminster/ Kensington & Chelsea	Major		NT3	Low	Incremental	C	Yes
53	Dagenham Heathway	Barking & Dagenham	District			Low	Medium		Yes
54	Green Lane	Barking & Dagenham/ Redbridge	District			Low	Incremental		Yes
55	Chadwell Heath	Barking & Dagenham/ Redbridge	District			Low	High		
56	Brent Street	Barnet	District			Low	Medium		
57	Chipping Barnet	Barnet	District		NT3	Low	Medium	C	
58	Church End, Finchley	Barnet	District			Low	Medium	C	
59	East Finchley	Barnet	District			Low	Medium		
60	Golders Green	Barnet	District			Low	Incremental		
61	Hendon Central	Barnet	District			Low	Medium		
62	Mill Hill	Barnet	District			Low	High		
63	New Barnet	Barnet	District			Low	Medium		
64	North Finchley	Barnet	District		NT3	Low	High	C	
65	Temple Fortune	Barnet	District			Medium	Incremental		
66	Whetstone	Barnet	District			Low	Medium	C	
67	Colindale/ The Hyde	Barnet/ Brent	District			Low	High		
68	Cricklewood	Barnet/ Brent/ Camden	District		NT3	Medium	High		Yes
69	Burnt Oak	Barnet/ Brent/ Harrow	District			Low	High		Yes
70	Crayford	Bexley	District			Low	Medium		
71	Erith	Bexley	District			Low	High		Yes
72	Sidcup	Bexley	District			Low	Medium		
73	Welling	Bexley	District			Low	Medium		
74	Ealing Road	Brent	District			Low	High		

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Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
75	Harlesden	Brent	District			Low	High		Yes
76	Neasden	Brent	District			Low	Medium		Yes
77	Preston Road	Brent	District			Low	Medium		
78	Wembley Park	Brent	District		NT3	Medium	High	C	Yes
79	Willesden Green	Brent	District			Low	Medium		
80	Kingsbury	Brent/ Harrow	District			Low	High		
81	Beckenham	Bromley	District		NT3	Low	Incremental		
82	Penge	Bromley	District			Low	Incremental		Yes
83	Petts Wood	Bromley	District			Low	Incremental		
84	West Wickham	Bromley	District			Low	Incremental		
85	Hampstead	Camden	District		NT3	Low	Incremental	C	
86	Kentish Town	Camden	District		NT3	Low	High	B	Yes
87	Swiss Cottage/ Finchley Road	Camden	District		NT2	Low	High	C	Yes
88	West Hampstead	Camden	District			Low	Medium		Yes
89	Addiscombe	Croydon	District			Low	Medium		
90	Coulsdon	Croydon	District			Low	Medium		
91	New Addington	Croydon	District			Low	Medium		Yes
92	Purley	Croydon	District			Low	High		
93	Selsdon	Croydon	District			Low	Incremental		
94	South Norwood	Croydon	District			Low	Medium		Yes
95	Thornton Heath	Croydon	District			Low	Medium		Yes
96	Norbury	Croydon	District		NT3	Low	Incremental		
97	Upper Norwood/ Crystal Palace	Croydon/ Lambeth/ Bromley	District			Low	High		
98	Herne Hill	Lambeth/ Southwark	District			Medium	Medium		
99	Acton	Ealing	District		NT3	Low	High		Yes

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Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
100	Greenford	Ealing	District			Low	High		
101	Hanwell	Ealing	District			Low	High		
102	Angel Edmonton	Enfield	District			Low	High		Yes
103	Edmonton Green	Enfield	District			Low	High		Yes
104	Palmers Green	Enfield	District			Low	Medium		
105	Southgate	Enfield	District			Low	Medium	C	
106	East Greenwich	Greenwich	District			Low	High		Yes
107	Greenwich West	Greenwich	District		NT3	Low	Incremental		
108	Plumstead	Greenwich	District			Low	Medium		Yes
109	Thamesmead	Greenwich	District			Low	High		
110	Stamford Hill	Hackney	District			Medium	Medium		Yes
111	Stoke Newington	Hackney	District		NT3	Low	Medium	C	Yes
112	Bruce Grove/ Tottenham High Road	Haringey	District			Low	Incremental		Yes
113	Crouch End	Haringey	District		NT3	Low	Incremental		
114	Green Lanes	Haringey	District		NT3	Medium	High		Yes
115	Muswell Hill	Haringey	District		NT3	Low	Incremental		
116	West Green Road/ Seven Sisters	Haringey	District			Low	Medium		Yes
117	North Harrow	Harrow	District			Low	Medium		
118	Pinner	Harrow	District			Low	Incremental		
119	Rayners Lane	Harrow	District			Low	Medium		
120	South Harrow	Harrow	District			Low	High		
121	Stanmore	Harrow	District			Low	Incremental	C	
122	Wealdstone	Harrow	District			Low	High	C	
123	Kenton	Harrow/ Brent	District			Low	High		
124	Collier Row	Havering	District			Low	Incremental		
125	Elm Park	Havering	District			Low	Medium		

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Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
126	Harold Hill	Havering	District			Medium	Incremental		Yes
127	Hornchurch	Havering	District		NT3	Low	Medium		
128	Rainham	Havering	District			Low	Incremental		Yes
129	Upminster	Havering	District			Low	Medium		
130	Eastcote	Hillingdon	District			Low	High		
131	Hayes	Hillingdon	District		NT3	Low	High		Yes
132	Northwood	Hillingdon	District			Low	Incremental		
133	Ruislip	Hillingdon	District			Low	Incremental		
134	Yiewsley/ West Drayton	Hillingdon	District		NT3	Low	High		
135	Brentford	Hounslow	District			High	High	A/ B	
136	Feltham High Street	Hounslow	District			Medium	High	C	Yes
137	Archway	Islington	District		NT3	Low	Medium	C	Yes
138	Finsbury Park	Islington/ Hackney/ Haringey	District		NT3	Medium	High	C	Yes
139	Brompton Cross	Kensington & Chelsea	District			Medium	Medium	C	
140	Earls Court Road	Kensington & Chelsea	District			Low	Incremental	C	Yes
141	Fulham Road	Kensington & Chelsea	District			Low	Incremental	C	
142	King's Road (west)	Kensington & Chelsea	District			Medium	Incremental	C	Yes
143	Notting Hill Gate	Kensington & Chelsea	District			Medium	Medium	B	
144	Portobello	Kensington & Chelsea	District			Medium	Incremental	C	Yes
145	South Kensington	Kensington & Chelsea	District		NT1	Low	Medium	C	
146	New Malden	Kingston	District			Low	High	C	
147	Surbiton	Kingston	District			Low	Medium	C	
148	Tolworth	Kingston	District			Low	High	C	

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Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
149	Clapham High Street	Lambeth	District		NT2	Low	Medium		Yes
150	Stockwell	Lambeth	District			Low	Incremental		Yes
151	West Norwood/ Tulse Hill	Lambeth	District			Low	High		Yes
152	Lavender Hill/ Queenstown Road	Lambeth/ Wandsworth	District			Low	High	C	Yes
153	Deptford	Lewisham	District			Low	Medium		Yes
154	Downham	Lewisham	District			Low	Incremental		Yes
155	Forest Hill	Lewisham	District			Low	Incremental		Yes
156	New Cross and New Cross Gate	Lewisham	District		NT3	Low	Medium		Yes
157	Sydenham	Lewisham	District			Low	Medium		Yes
158	Blackheath	Lewisham/ Greenwich	District		NT3	Low	Incremental		
159	Lee Green	Lewisham/ Greenwich	District			Low	Medium		
160	Mitcham	Merton	District			Low	High		Yes
161	Morden	Merton	District			Low	High		
162	Canning Town	Newham	District			Medium	High		Yes
163	East Beckton	Newham	District			Low	High		Yes
164	Forest Gate	Newham	District			Low	Incremental		Yes
165	Green Street	Newham	District			Medium	High		Yes
166	Barkingside	Redbridge	District			Low	High		
167	Gants Hill	Redbridge	District		NT3	Low	High		
168	South Woodford	Redbridge	District		NT3	Low	High		
169	Wanstead	Redbridge	District			Low	Incremental		
170	East Sheen	Richmond	District			Medium	Incremental	C	
171	Teddington	Richmond	District		NT3	Low	Incremental	C	
172	Twickenham	Richmond	District		NT3	Medium	Incremental	B	
173	Whitton	Richmond	District			Low	Incremental		

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Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
174	Dulwich - Lordship Lane	Southwark	District			Low	Medium		
175	Camberwell	Southwark/ Lambeth	District			Low	Medium		Yes
176	Carshalton Villiage	Sutton	District			Low	Incremental		
177	Cheam Village	Sutton	District			Low	Incremental		
178	North Cheam	Sutton	District			Low	Medium		
179	Rosehill	Sutton	District			Low	Incremental		Yes
180	Wallington	Sutton	District			Low	Medium		
181	Worcester Park	Sutton	District			Low	Incremental		
182	Bethnal Green	Tower Hamlets	District			Low	High		Yes
183	Brick Lane	Tower Hamlets	District		NT2	Medium	Incremental		Yes
184	Chrisp Street	Tower Hamlets	District			Low	Medium		Yes
185	Roman Road (east)	Tower Hamlets	District			Low	Incremental		Yes
186	Roman Road (west)	Tower Hamlets	District			Low	Medium		Yes
187	Watney Market	Tower Hamlets	District			Low	High		Yes
188	Whitechapel	Tower Hamlets	District			Medium	Medium		Yes
189	Bakers Arms	Waltham Forest	District			Low	Medium		Yes
190	Highams Park	Waltham Forest	District			Low	Medium		Yes
191	Leyton	Waltham Forest	District			Medium	High		Yes
192	Leytonstone	Waltham Forest	District			Low	Medium		Yes
193	North Chingford	Waltham Forest	District			Low	Medium		
194	South Chingford	Waltham Forest	District			Low	Medium		
195	Wood Street	Waltham Forest	District			Low	Medium		Yes
196	Balham	Wandsworth	District			Medium	High	C	
197	Earlsfield	Wandsworth	District			Low	Medium		

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Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
198	Edgware Road/ Church Street	Westminster	District		NT3	Medium	High		Yes
199	Harrow Road	Westminster	District			Low	Medium		Yes
200	Praed Street/ Paddington	Westminster	District		NT3	Low	Incremental		
201	St John's Wood	Westminster	District			Low	Incremental		Yes
202	Euston Road (part)	Camden	CAZ retail cluster			Medium	Incremental	CAZ	Yes
203	High Holborn/ Kingsway	Camden	CAZ retail cluster			High	Incremental	CAZ	Yes
204	King's Cross/ St Pancras	Camden	CAZ retail cluster		NT2	High	Incremental	CAZ	Yes
205	Tottenham Court Road (part)	Camden	CAZ retail cluster		NT1	Medium	Incremental	CAZ	
206	Cheapside	City of London	CAZ retail cluster		NT3	Medium	Incremental	CAZ	
207	Fleet Street	City of London	CAZ retail cluster			Low	Incremental	CAZ	
208	Leadenhall Market	City of London	CAZ retail cluster			Medium	Incremental	CAZ	
209	Liverpool Street	City of London	CAZ retail cluster		NT3	High	Incremental	CAZ	
210	Moorgate	City of London	CAZ retail cluster			High	Incremental	CAZ	
211	Shoreditch	Hackney/ Islington	CAZ retail cluster		NT1	Medium	Incremental	CAZ	Yes
212	Farringdon	Islington	CAZ retail cluster		NT2	Medium	Incremental	CAZ	
213	Waterloo	Lambeth	CAZ retail cluster		NT2	Medium	Incremental	CAZ	
214	Bankside and The Borough	Southwark	CAZ retail cluster		NT1	High	Medium	CAZ	Yes
215	London Bridge	Southwark	CAZ retail cluster		NT2	High	Incremental	CAZ	
216	Wentworth Street	Tower Hamlets	CAZ retail cluster			Medium	Incremental	CAZ	Yes
217	Baker Street (part)	Westminster	CAZ retail cluster			Medium	Incremental	CAZ	
218	Covent Garden/ Strand	Westminster	CAZ retail cluster		NT1	Medium	Incremental	CAZ	

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Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
219	Edgware Road South	Westminster	CAZ retail cluster		NT3	Medium	Incremental	CAZ	Yes
220	Marylebone High Street	Westminster	CAZ retail cluster		NT3	Medium	Incremental	CAZ	
221	Marylebone Road	Westminster	CAZ retail cluster			Medium	Incremental	CAZ	Yes
222	Victoria Street	Westminster	CAZ retail cluster		NT2	High	Incremental	CAZ	
223	Warwick Way/ Tachbrook Street	Westminster	CAZ retail cluster			Medium	Incremental	CAZ	Yes
Centres with Night-time Economy classification only									
224	Barbican	City of London	Unclassified		NT1	Medium	Incremental		
225	Southbank	Lambeth	Unclassified		NT1	Medium	Incremental	CAZ	
Centres with Future Potential Network classification only									
226	Brent Cross	Barnet	Unclassified	Metropolitan		High	High	A/ B	Yes
227	Old Oak High Street	Hammersmith & Fulham/ Ealing	Unclassified	Major		Medium	High	A/ future potential CAZ satellite	Yes
228	Gallions Reach	Newham	Unclassified	Major		Medium	High		
229	Barking Riverside	Barking & Dagenham	Unclassified	District		Medium	Medium		
230	Merrielands Crescent	Barking & Dagenham	Unclassified	District		Medium	High		Yes
231	Belvedere	Bexley	Unclassified	District		Medium	Medium		
232	North Greenwich	Greenwich	Unclassified	District	NT1	High	High		Yes
233	Tottenham Hale	Haringey	Unclassified	District		High	High		Yes
234	Colliers Wood	Merton	Unclassified	District		Medium	High		
235	Old Kent Road/ East Street	Southwark	Unclassified	District		Medium	High	B	Yes
236	Old Kent Road/ Peckham Park Road	Southwark	Unclassified	District		Medium	High		Yes
237	Hackbridge	Sutton	Unclassified	District		Medium	Medium		

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Ref	Centre	Borough	Network classification	Future potential network classification	Night-time economy classification	Commercial growth potential	Residential growth potential	Office guidelines	Strategic area for regeneration*
238	Bromley-by-Bow	Tower Hamlets	Unclassified	District		Medium	High		Yes
239	Crossharbour	Tower Hamlets	Unclassified	District		High	High		
240	Vauxhall	Lambeth/ Wandsworth	Unclassified	CAZ retail cluster	NT2	High	High	CAZ	Yes
241	Battersea	Wandsworth	Unclassified	CAZ retail cluster		High	High	CAZ	

* This classification refers to those town centres that are within or overlap with the Strategic Areas for Regeneration (see Policy SD10 Strategic and local regeneration).

Annex 2

Inner and Outer London Boroughs

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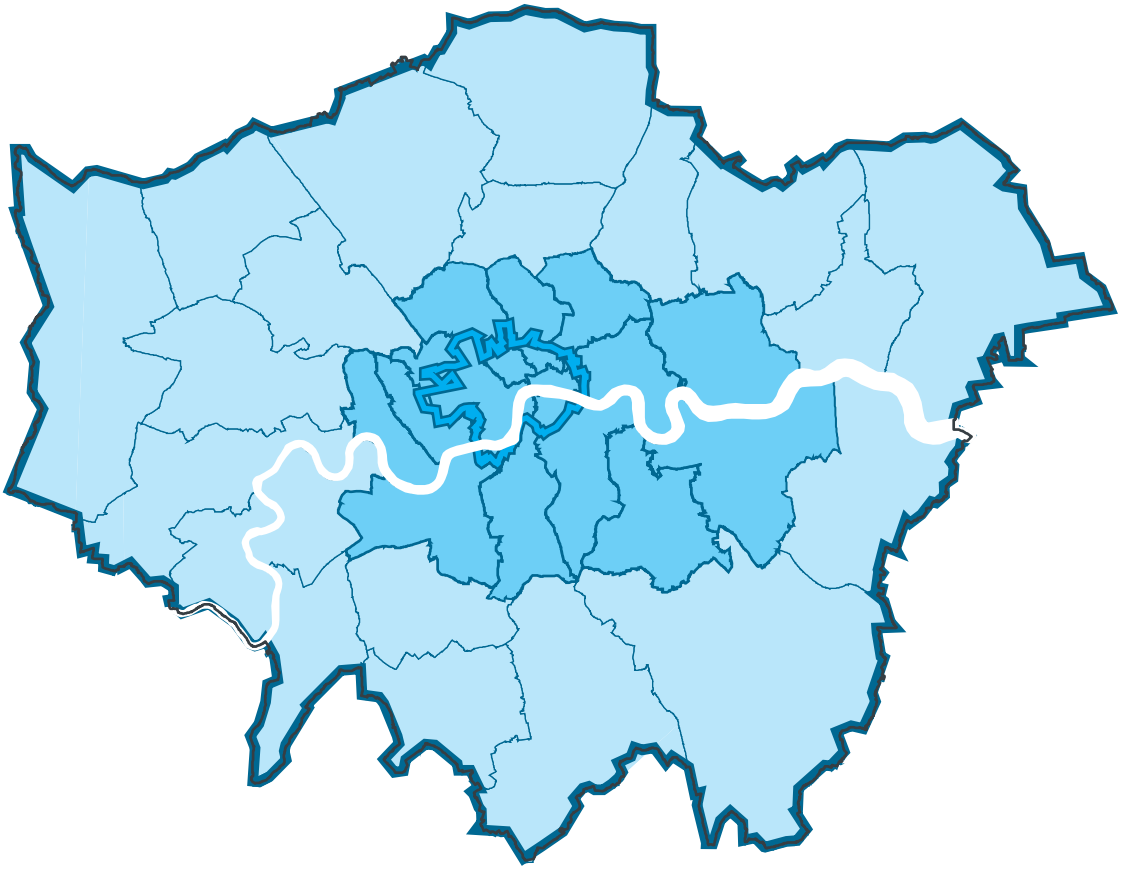
Figure A2.1 - CAZ, Inner and Outer London



Inner/ Outer London and the CAZ

- CAZ
- Inner
- Outer

Source: GLA Planning

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Table A2.2 - Inner and Outer London Boroughs

Borough name	Location
Barking & Dagenham	Outer
Barnet	Outer
Bexley	Outer
Brent	Outer
Bromley	Outer
City of London	Inner*
Camden	Inner*
Croydon	Outer
Ealing	Outer
Enfield	Outer
Greenwich	Inner*
Hackney	Inner*
Hammersmith & Fulham	Inner*
Haringey	Outer
Harrow	Outer
Havering	Outer
Hillingdon	Outer
Hounslow	Outer
Islington	Inner*
Kensington & Chelsea	Inner*
Kingston	Outer
Lambeth	Inner*
Lewisham	Inner*
Merton	Outer
Newham	Inner*
Redbridge	Outer
Richmond	Outer
Southwark	Inner*

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Borough name	Location
Sutton	Outer
Tower Hamlets	Inner*
Waltham Forest	Outer
Wandsworth	Inner*
Westminster	Inner*

*Boroughs that contain part of the Central Activities Zone

Annex 3

Glossary

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Abbreviations

ACV	Asset of Community Value
AGPs	Artificial grass pitches
APA	Archaeological Priority Area
AQA	Air Quality Assessment
AQFA	Air Quality Focus Area
BAME	Black, Asian and Minority Ethnic
BLE	Bakerloo line extension
BREEAM	Building Research Establishment Environmental Assessment Method
CAZ	Central Activities Zone
CCG	Clinical Commissioning Group
CD&E	Construction, demolition and excavation
CEZ	Creative Enterprise Zone
CHP	Combined heat and power
CIBSE	Chartered Institution of Building Services Engineers
CIL	Community Infrastructure Levy
CO_2	Carbon dioxide
COBR	Cabinet Office Briefing Rooms
DE	Decentralised Energy
DEC	Display Energy Certificate
DLR	Docklands Light Railway
DMR	Discounted Market Rent
EDS	The Mayor's Economic Development Strategy
EUV+	Existing Use Value Plus
FE	Further education
GHG	Greenhouse gas
GIA	Gross Internal Area
GLA	Greater London Authority
GLHER	Greater London Historic Environment Record
GVA	Gross Value Added

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Ha	Hectare
HMO	House in Multiple Occupation
HS2	High Speed 2
IMD	Index of Multiple Deprivation
kWh	Kilowatt hour
LAA	Local Aggregates Assessment
LAEI	London Atmospheric Emissions Inventory
LDD	London Development Database
LFEPA	London Fire and Emergency Planning Authority
LGBT+	Lesbian Gay Bisexual Trans +
LIGS	Locally Important Geological Sites
LLDC	London Legacy Development Corporation
LLFA	Lead Local Flood Authority
LLR	London Living Rent
LSIS	Locally Significant Industrial Sites
LVMF	London View Management Framework
MCIL	Mayoral Community Infrastructure Levy
MMO	Marine Management Organisation
MOL	Metropolitan Open Land
NHS	National Health Service
NIOD	Northern Isle of Dogs
NO_2	Nitrogen dioxide
NOx	Oxides of nitrogen, or nitrogen oxides: a mixture of nitric oxide and nitrogen dioxide
NPPG	National Planning Practice Guidance
NPPF	National Planning Policy Framework
OA	Opportunity Area
OAPF	Opportunity Area Planning Framework
OPDC	Old Oak and Park Royal Development Corporation
PBSA	Purpose-Built Student Accommodation
PDR	Permitted development rights

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PLA	Port of London Authority
PTAL	Public Transport Access Level
PV	Photovoltaic
RFRA	Regional Flood Risk Appraisal
RIGS	Regionally-Important Geological Sites
SAC	Special Areas of Conservation
SEND	Special Educational Needs and Disability
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SIL	Strategic Industrial Locations
SINC	Site of Importance for Nature Conservation
SOLDC	Strategic Outer London Development Centre
SMEs	Small and medium-sized enterprises (including micro-businesses)
SPA	Special Protection Areas
SPG	Supplementary Planning Guidance
Sqm	Square metres
SRF	Solid recovered fuel
STPs	Sustainability and Transformation Plans
TE2100	Thames Estuary 2100 Plan
TER	Target Emission Rate
TfL	Transport for London
TPA	Thames Policy Area
UGF	Urban Greening Factor
UKOOG	United Kingdom Onshore Oil and Gas Group
WERLSPA	West End Retail and Leisure Special Policy Area
WHS	World Heritage Sites
WSE	Wider South East

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Definitions

A

Active provision for electric vehicles

A socket or equivalent connected to the electrical supply system that vehicle owners can use to recharge their vehicle (see also 'Passive provision for electric vehicles').

Affordable commercial and shop units

Commercial and shop units (falling within use classes A1-A5) that are provided at rents maintained below the market rate for that space.

Affordable housing

See Policy H4 Delivering affordable housing.

Affordable workspace

Workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose.

Agent of Change principle

The principle places the responsibility of mitigating the impact of nuisances (including noise) from existing nuisance generating uses on proposed new development close by, thereby ensuring that residents and users of the new development are protected from nuisances, and existing uses are protected from nuisance complaints. Similarly, any new nuisance-generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.

Aggregates

This is granular material used in construction. Aggregates may be natural, artificial or recycled.

Air Quality Neutral

An Air Quality Neutral development is one that meets, or improves upon, the air quality neutral benchmarks published in guidance from the GLA. The benchmarks set out the maximum allowable emissions of NOx and Particulate Matter based on the size and use

class of the proposed development. Separate benchmarks are set out for emissions arising from the development and from transport associated with the development. Air Quality Neutral applies only to the completed development and does not include impacts arising from construction, which should be separately assessed in the Air Quality Assessment.

Air Quality Management Area

An area which a local authority had designated for action, based upon a prediction that Air Quality Objectives will be exceeded.

Albedo

The surface reflectivity of the sun's radiation.

Ambient noise

Ongoing sound in the environment such as from transport and industry, as distinct from individual events, such as a noisy all-night party. Unless stated otherwise, noise includes vibration.

Amenity

Element of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.

Anaerobic digestion

Biological degradation of organics (e.g. food waste and green garden waste) in the absence of oxygen, producing biogas suitable for energy generation (including transport fuel), and residue (digestate) suitable for use as a soil improver.

Apart-hotel

Self-contained hotel accommodation (C1 Use Class) that provides for short-term occupancy purchased at a nightly rate with no deposit against damages. This will usually include concierge and room service, and include formal procedures for checking in and out. Planning conditions may limit length of stay for occupiers.

Archaeological interest

There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

Areas of deficiency in access to nature

Areas where people have to walk more than one kilometre to reach a publicly accessible metropolitan or borough Site of Importance for Nature (SINC).

Areas of deficiency in access to public open space

Areas lacking in sufficient publicly accessible open space, as defined by a set of standards in Policy G4 Open space.

Article 4 Direction

A tool used by local planning authorities to remove some or all permitted development rights that apply to a particular site or area.

Attributes (World Heritage Sites)

Attributes are tangible or intangible aspects of a World Heritage property which are associated with or express the Outstanding Universal Value (OUV) and can be the physical elements, the relationships between elements and/or time related processes. The UNESCO Operational Guidelines for the Implementation of the World Heritage Convention (the Operational Guidelines) indicate a range of types of attribute which might convey OUV, including form and design; materials and substance; use and function; traditions; techniques and management systems; location and setting; language and other forms of intangible heritage; and spirit and feeling. Attributes identified for a property should flow from the adopted Statement of Outstanding Universal Value.

Authenticity (World Heritage Sites)

Authenticity relates only to cultural properties and is about the link between attributes and Outstanding Universal Value. It is embodied in those characteristics that most truthfully reflect and embody the cultural heritage values of a place. They can be expressed in the variety of types of attributes listed in the definition of attributes (Operational Guidelines).

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B

Beneficial use (excavation waste)

The placement of excavation waste to land in a way that:

- provides environmental benefits, particularly through the restoration of priority habitat, flood alleviation or climate change adaptation/mitigation; or
- contributes towards the restoration of landfill sites and mineral workings

while

- minimising adverse impacts to the environment or communities (for example transport, air quality and other considerations); and
- demonstrating that the waste cannot be recycled or treated and managed in a more sustainable way.

Biodiversity

This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

Biodiversity offsets

Measures to improve existing or create replacement habitat where there are unavoidable impacts on wildlife habitats resulting from development or change of land use.

Biomass

The total dry organic matter or stored energy of plant matter. As a fuel it includes energy crops and sewage as well as arboricultural forestry and agricultural residues.

Blue roofs

Attenuation tanks at roof or podium level.

Blue / water space

Areas covered by water including the River Thames and other rivers, canals, reservoirs, lakes and ponds.

Boroughs

The London boroughs are 32 of the 33 local authority districts within the Greater London administrative area (the 33rd is the City of London). For the purposes of this Plan, this term includes all Local Planning Authorities including the City of London and the Mayoral Development Corporations.

Brownfield land

See Previously Developed Land

Build to Rent

Schemes which meet the definition set out in Policy H11 Build to Rent.

Build to Rent Clawback

A payment to the relevant Local Planning Authority for the provision of affordable housing in the event that the Build to Rent Covenant is broken through the sale of units out of rented tenure within the covenant period.

Build to Rent Covenant

A covenant within a Section 106 agreement to ensure new private rented homes are secured for the rental market for a minimum of 15 years. During this period the private rented homes must be retained in single ownership. Homes cannot be sold out of rented tenure or the covenant would be broken triggering a Build to Rent Clawback payment to the relevant Local Planning Authority for the provision of affordable housing.

Business Improvement Districts (BIDs)

A defined area in which a levy is charged on all business rate payers in addition to the business rates bill. This levy is used to develop projects that will benefit businesses in the local area.

C

Carbon dioxide (CO_2)

Principal greenhouse gas related to climate change.

Car club

A short-term car rental service that allows members access to cars parked locally for a per-minute, per-hour or per-day fee.

Central Activities Zone (CAZ)

The vibrant heart and globally iconic core of London. The CAZ contains a broad range of functions that have London-wide, national and international significance including Government, business, culture, research and education, retailing, tourism, transport and places of worship. The CAZ offers access to a unique collection of heritage and environmental assets including World Heritage Sites, the Royal Parks and the River Thames.

Circular economy

An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.

CleanTech

Clean technology (CleanTech) is a general term used to describe products, processes or services that reduce waste and require as few non-renewable resources as possible.

Combined heat and power

The combined production of electricity and usable heat is known as Combined Heat and Power (CHP). Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.

Commercial waste

Waste arising from premises which are used wholly or mainly for trade, business, sport, recreation or entertainment as defined in Schedule 4 of the Controlled Waste Regulations 1992.

Community engagement

Community engagement is a process that involves communities in deliberation, decision making and practical action. Community engagement can be done using a wide range of methods, and can include both face to face and online engagement.

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Communal heating systems

A communal heating system supplies heat to multiple properties from a common heat source. It may range from a district system heating many buildings to a system serving an individual block of flats.

Community-led housing

Schemes that are genuinely community-led all share three common principles: meaningful community engagement and consent occurs throughout the development process (communities do not necessarily have to initiate the conversation, or build homes themselves); there is a presumption that the community group or organisation will take a long-term formal role in the ownership, stewardship or management of the homes; and the benefits of the scheme to the local area and/or specified community group are clearly defined and legally protected in perpetuity.

Comparison retail/shopping

These refer to shopping for things like clothes, electrical items, household and leisure goods. Comparison goods are bought relatively infrequently, so consumers usually evaluate prices, features and quality before making a purchase.

Conservation (heritage)

The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Construction, demolition and excavation waste

This is waste arising from the excavation, construction, repair, maintenance and demolition of buildings and structures, including roads. It consists mostly of brick, concrete, hardcore, subsoil and topsoil, but it can contain quantities of timber, metal, plastics and occasionally special (hazardous) waste materials.

Convenience retail/shopping

These refer to shopping for everyday essential items like food, drink, newspapers and confectionery.

Creative Enterprise Zone

A Mayor of London initiative to establish clusters of creative production, which provide affordable premises and enterprise-related incentives for artists and creative businesses, pro-culture planning and housing policies, and offer career pathways and creative jobs for local communities and young people.

Creative Industries

Those industries which have their origin in individual creativity, skill and talent which have a potential for wealth and job creation through the generation and exploitation of intellectual property.

Cultural Quarters

Areas where a critical mass of cultural activities and related uses, usually in historic or interesting environments, are designated as Cultural Quarters. They can contribute to urban regeneration.

D

Decentralised energy

A range of definitions exists for decentralised energy. In the context of the London Plan, it refers to low- and zero-carbon power and/or heat generated and delivered within London. This includes microgeneration, such as photovoltaics on individual buildings, through to large-scale heat networks.

Design and access statement

A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with. The access element of the statement should demonstrate how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.

Designated heritage asset

A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

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Development

This refers to development in its widest sense, including buildings, and in streets, spaces and places. It also refers to both redevelopment, including refurbishment, as well as new development.

Development Plan

The London Plan, Local Plans, other Development Plan Documents and Neighbourhood Plans.

Development proposal

This refers to development that requires planning permission.

Digital infrastructure

Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.

Display Energy Certificate

Display Energy Certificates (DECs) are designed to show the energy performance of public buildings. They use a scale that runs from 'A' to 'G' – 'A' being the most efficient and 'G' being the least.

District centres

See Annex 1.

District Heating Network (DHN)

A network of pipes carrying hot water or steam, usually underground, that connects heat production equipment with heat customers. They can range from several metres to several kilometres in length.

Drainage hierarchy

Policy hierarchy helping to reduce the rate and volume of surface water run-off.

Dual aspect dwelling

A dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building. The provision of a bay window does not constitute dual aspect.

E

Embodied carbon / energy / emissions

The total life cycle carbon / energy / greenhouse gases used in the collection, manufacture, transportation, assembly, recycling and disposal of a given material or product.

Energy efficiency

Making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience.

Energy hierarchy

The Mayor's tiered approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand (be lean), the second step is to supply energy efficiently (be clean) and the third step is using renewable energy (be green).

Energy masterplanning

Spatial and strategic planning that identifies and develops opportunities for decentralised energy and the associated technical, financial and legal considerations that provide the basis for project delivery.

Environmental assessments

In these assessments, information about the environmental effects of a project is collected, assessed and taken into account in reaching a decision on whether the project should go ahead or not.

Environmental statement

This statement will set out a developer's assessment of a project's likely environmental effects, submitted with the application for consent for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.

F

Family housing

A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms.

Freight

A general term to refer to trips made for the purposes of delivering goods, enabling servicing activity or supporting construction.

Fuel cell

A cell that acts like a constantly recharging battery, electrochemically combining hydrogen and oxygen to generate power. For hydrogen fuel cells, water and heat are the only by-products and there is no direct air pollution or noise emissions. They are suitable for a range of applications, including vehicles and buildings.

Futureproofing

Ensuring that designs are adaptable and take account of expected future changes.For example, ensuring a heating system is designed to be compatible with a planned district heat network to allow connection in future.

G

Geodiversity

The variety of rocks, fossils, minerals, landforms, soils and natural processes, such as weathering, erosion and sedimentation, that underlie and determine the character of our natural landscape and environment.

General and business aviation

A range of ad hoc aviation services and activities including private jets, recreational flying and pilot training.

Green Belt

A designated area of open land around London (or other urban areas). The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green corridors

Relatively continuous areas of open space leading through the built environment, which may link to each other and to the Green Belt or Metropolitan Open Land. They often consist of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields and extensive areas of private gardens. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

Green cover

The total area covered by vegetation and water across London. It not only includes publicly accessible and publicly managed vegetated land (i.e. green space) and waterways, but also non-accessible green and blue spaces, as well as privately owned vegetated land including private gardens and agricultural land, and the area of vegetated cover on buildings and in the wider built environment such as green roofs, street trees and rain gardens.

Green infrastructure

Comprises the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment, such as street trees, green roofs and sustainable drainage systems, all of which provide a wide range of benefits and services.

Green roofs/walls

Planting on roofs or walls to provide climate change, amenity, food growing and recreational benefits.

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Greenfield runoff rates

The Greenfield runoff rate is the runoff rate from a site in its natural state, prior to any development. This should be calculated using one of the runoff estimation methods set out in Table 24.1 of CIRIA C753 The SuDS Manual.

Greenhouse gas

Any gas that induces the greenhouse effect, trapping heat within the atmosphere that would normally be lost to space, resulting in an increase in average atmospheric temperatures, contributing to climate change. Examples include carbon dioxide, methane and nitrous oxides.

Green space

All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape.

Greening

The improvement of the appearance, function and wildlife value of the urban environment through use of vegetation or water.

H

Habitable room

A habitable room is any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, corridors, hallways, utility rooms or similar should not be considered habitable rooms.

Habitable floorspace

Habitable floorspace is all floorspace with a floor to ceiling height of 1.5m or over within a habitable room. Floorspace within habitable rooms with a floor to ceiling height of between 0.9m and 1.5m is counted as 50 per cent of its floor area and any floor area with a floor to ceiling height lower than 0.9m is not counted as habitable floorspace.

Health Impact Assessment (HIA)

Health Impact Assessment (HIA) is used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise. HIA should be undertaken as early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.

Health inequalities

Health inequalities are systematic, avoidable and unfair differences in mental and/or physical health between groups of people. These differences affect how long people live in good health and are mostly a result of differences in people's homes, education and childhood experiences, their environments, their income, jobs and employment prospects, their access to good public services and their everyday opportunities to live healthier lives.

Heritage assets

Valued components of the historic environment. They include buildings, monuments, sites, places, areas or landscapes positively identified as having a degree of historic significance meriting consideration in planning decisions. They include both designated heritage assets and non-designated assets where these have been identified by the local authority (including local listing) during the process of decision-making or plan making.

Historic environment

All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Household waste

Household waste includes waste from collection rounds of domestic properties (including separate rounds for the collection of recyclables), street cleansing and litter collection, beach cleansing, bulky household waste collections, hazardous household waste collections, household clinical waste collections, garden waste collections, and any other household waste collected by the waste authorities.

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Houses in Multiple Occupation (HMOs)

HMOs are dwellings which are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet. HMOs for between three and six people are classed as C4 whereas HMOs for more than six people are Sui Generis.

I

Impermeable surface

Mainly artificial structures (such as pavements, roads, driveways, parking areas and rooftops) that are covered by materials impenetrable to water (such as asphalt, concrete, brick and stone). Impermeable surfaces also collect solar heat in their dense mass. When the heat is released, it raises air temperatures (see 'Urban heat island').

Incineration

The controlled burning of waste in the presence of sufficient air to achieve complete combustion. Energy is usually recovered in the form of electric power and/or heat. The emissions are controlled under EU Directive 2000/76/EC. This Directive also applies to other thermal treatment processes such as pyrolysis and gasification, so the term incineration may be applied to a wider range of thermal waste treatment processes.

Inclusive design

Inclusive design results in an environment which everyone can use, to access and benefit from the full range of opportunities available; confidently, independently, with choice and dignity, which avoids separation or segregation and is made up of places and spaces that acknowledge diversity and difference, meeting the needs of everyone in society.

Inert waste

Waste is inert if:

1. it does not undergo any significant physical, chemical or biological transformations
2. it does not dissolve, burn or otherwise physically or chemically react, biodegrade or adversely affect other matter with which it comes into contact in a way likely to give rise to environmental pollution or harm to human health; and
3. its total leachability and pollutant content and the ecotoxicity of its leachate are insignificant and, in particular, do not endanger the quality of any surface water or groundwater.

(Adapted from Environment Agency, Quality Protocol – Aggregates from inert waste, October 2013)

Inner London

The area covered by the inner London boroughs. See Annex 2.

Industrial waste

Waste from any factory and any premises occupied by industry (excluding mines and quarries) as defined in Schedule 3 of the Controlled Waste Regulations 1992.

Infrastructure

Includes transport, energy, water, waste, digital/smart, social and green infrastructure.

Innovation

The creation of new products and services, technologies, processes, or business models.

Inclusive neighbourhoods

An inclusive neighbourhood is one in which people can live and work in a safe, healthy, supportive and inclusive neighbourhood. An inclusive neighbourhood will ensure that people are able to enjoy the options of easy access by public transport and active travel modes (walking and cycling), to services and facilities that are relevant to them. It will also allow people to safely and easily move around their neighbourhood through high quality people focused spaces, while enjoying barrier free access to surrounding areas and the wider city. They should have safe and easy access to a network of open spaces which meet their recreational needs to enhance health and wellbeing, as well as welcoming easily accessible communal spaces which provide opportunities for social interaction.

Integrity (World Heritage Sites)

Integrity is a measure of the completeness or intactness of the World Heritage property and its attributes which express the Outstanding Universal Value it holds (UNESCO Operational Guidelines).

J

No entries

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K

No entries

L

Linear view

A view in which key landmarks are seen through narrow gaps between buildings or landscaping.

Local Asset-Backed Vehicle

A means of enabling a partnership of public and private sector organisations in regeneration schemes. In a simple model, the public sector body creates a Special Purpose Vehicle (SPV) with a private sector partner. The public body transfers land to this partner at market value which is then matched by the private partner with at least an equivalent amount of investment capital. These investments form the equity of the SPV. The private partner undertakes the development and the public sector partner receives a share of profits in return for its land investment.

Local centres

See Annex 1.

London Development Database

This provides current and historic information about development progress across all London boroughs. It is operated by the GLA with data supplied by London's planning authorities.

London's major airports

Airports in and around London offering scheduled international flights and which operate or have permission for more than 50,000 flight movements a year – i.e. London City, Heathrow, Gatwick, Stansted, Luton, and Southend.

London Panorama

A broad prospect seen from an elevated public viewing place.

Low Emission Zone (LEZ)

A charging zone across most of Greater London for vehicles (excluding cars) that do not meet emissions standards.

M

Main town centre uses

Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Major development

For a full definition, see Part 1 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. Generally, major developments are:

- Development of dwellings where 10 or more dwellings are to be provided, or the site area is 0.5 hectares or more;
- Development of other uses, where the floor space is 1,000 square metres or more, or the site area is 1 hectare or more.

Major town centres

See Annex 1.

MedCity

An enterprise to promote and grow life sciences investment, entrepreneurship, collaboration and industry in London and the Wider South East. MedCity is a partnership between the Mayor and the Academic Health Science Centres in London, Cambridge and Oxford.

Metropolitan Open Land

Extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt and is protected from inappropriate development by land-use planning policies.

Metropolitan town centres

See Annex 1.

Mixed-use development

Development for a variety of activities on single sites or across wider areas such as town centres.

Multi-channel retailing

A retailing strategy that offers customers a choice of ways to buy products including for example, retail stores, online, mobile stores, mobile app stores, telephone sales, mail orders, interactive television and comparison shopping sites.

Municipal solid waste

It includes all household waste, street litter, waste delivered to council recycling points, municipal parks and gardens wastes, council office waste, Civic Amenity waste, and some commercial waste from shops and smaller trading estates where local authorities have waste collection agreements in place. It can also include industrial waste collected by a waste collection authority with authorisation of the waste disposal authority. Waste under the control of local authorities or agents acting on their behalf is now better known as 'Local Authority Collected Waste'.

N

National Nature Reserves

Designated by Natural England under the Wildlife and Countryside Act 1981, they are key places for wildlife and natural features. They were established to protect the most significant areas of habitat and of geological formations.

Nature conservation

Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.

Neighbourhood centres

See Annex 1.

O

Open space

All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

Operational parking

Parking for vehicles which are required for the function of a building or the activities within it. This can include spaces for fleet vehicles, taxis or loading bays, but does not include parking for personal travel such as commuting.

Opportunity Areas

London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.

Outer London

The area covered by the outer London boroughs. See Annex 2.

Outstanding Universal Value

Cultural and/or natural significance that is so exceptional that it transcends national boundaries and is of common importance for both present and future generations. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site at the time of its inscription. This Value can be expressed by physical, architectural or intangible attributes that are embodied in the buildings, spaces, monuments, artefacts and archaeological deposits within the site, the setting and views of and from it. Statements of Outstanding Universal Value are key references for the effective protection and management of World Heritage Sites and can be found at http://whc.unesco.org/en/list.

See also Attributes, Authenticity, and Integrity.

P

Passive provision for electric vehicles

The network of cables and power supply necessary so that at a future date a socket or equivalent can be added easily to allow vehicle owners to recharge their vehicle (see also 'Active provision for electric vehicles').

Permitted Development Rights

A general planning permission granted not by the local authority but by Parliament. Legislation (currently the Town and Country Planning (General Permitted Development (England) Order 2015) sets out classes of development for which a grant of planning permission is automatically given, provided that no restrictive condition is attached or that the development is exempt from the permitted development rights.

Photovoltaics (PV)

The direct conversion of solar radiation into electricity by the interaction of light with electrons in a semiconductor device or cell.

Planning frameworks

These frameworks provide a sustainable development programme for Opportunity Areas. The frameworks may be prepared by the GLA Group, boroughs, developers or partners. While planning frameworks will have a non-statutory status, it will be up to boroughs to decide how to reflect the proposals in planning frameworks within their Development Plans.

Precision-manufactured homes

Homes built using a high proportion of components which are produced using modern and technologically-driven methods of manufacture, with this production often taking place offsite and the components then assembled onsite.

Previously developed land

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes:

land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Prime, secondary and tertiary commercial property

Terms used to describe the relative value or quality of a commercial investment property and its location. Typically, prime or Grade A offices include buildings of the highest quality and often in the most central locations of any given office market and with rents above the average for the area. Secondary property includes buildings with a lower quality or less central location compared to prime property. Tertiary property refers to buildings suitable for occupation but with the lowest quality specification and in less attractive or fringe locations and with rents below average for the area.

Priority habitat

London's priority habitats are those areas of wildlife habitat which are of most importance in London. Most areas of priority habitat are protected within Sites of importance for Nature Conservation.

Priority species

These are species that are a conservation priority because they are under particular threat, or they are characteristic of a particular region.

Protected species

Certain plant and animal species protected to various degrees in law, particularly the Wildlife and Countryside Act, 1981 (as amended).

Private rented sector

All non-owner-occupied self-contained dwellings that are being rented out as housing (not including forms of affordable housing).

Public realm

Publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces.

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Public Transport Access Levels (PTALs)

Public Transport Access Levels (PTALs) are calculated across London using a grid of points at 100m intervals. For each point walk time to the public transport network is combined with service wait time (frequency) to give a measure of public transport network density.

TfL has made pre-calculated PTALs available on WebCAT, its web-based connectivity assessment toolkit (www.tfl.gov.uk/WebCAT). Users can view PTALs for any location in London alongside contextual information such as the local street network, rail stations and bus stops. Users can also view the PTALs resulting from planned improvements to and extensions of the public transport network. A limitation of PTALs is that they only reflect access to the public transport network, but not the opportunities and services reachable through the network. To address this, WebCAT also includes travel time mapping and catchment statistics (population, jobs, town centres, heath services and educational establishments) within given time bands. These can also be viewed for any selected location and combined with PTAL to give a more complete picture of public transport connectivity.

TfL may refine how PTALs and WebCAT operate but will consult on any proposed changes with stakeholders in advance. This may include an opportunity for users to assess connectivity in relation to cycling time to the public transport network rather than just walking time.

Q

Quiet Areas

The Environmental Noise (England) Regulations 2006 (as amended) require that Noise Action Plans for agglomerations (including much of Greater London) include provisions that aim to protect any formally identified 'Quiet Areas' from an increase in road, railway, aircraft and industrial noise.

R

Ramsar Site

Nature conservation site designated under the Convention on Wetlands of International Importance 1971.

Recovery

Refers to "forms of recovery other than energy recovery and other than the reprocessing of waste into materials used as fuels or other means to generate energy. It includes preparing for re-use, recycling and backfilling and other forms of material recovery such as the reprocessing of waste into secondary raw materials for engineering purposes in construction of roads or other infrastructure. Depending on the specific factual circumstances, such reprocessing can fulfil the definition of recycling if the use of materials is based on proper quality control and meets all relevant standards, norms, specifications and environmental and health protection requirements for the specific use" – EU Directive 2018/851.

Recycling

Involves the reprocessing of waste, either into the same product or a different one. Many non-hazardous wastes such as paper, glass, cardboard, plastics and metals can be recycled. Hazardous wastes such as solvents can also be recycled by specialist companies, or by in-house equipment.

Renewable energy

Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

Retrofitting

The addition of new technology or features to existing buildings in order to make them more efficient and to reduce their environmental impacts.

Re-use

The operation or process of checking, cleaning or repairing materials that have been discarded and are waste so that they can be used again for their original purpose as non-waste without any other pre-processing.

Adapted from Environment Agency, Guidance – Decide if a material is waste or not: general guide, May 2016

River prospects

Short and longer distance visual experiences of the Thames riverscape.

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S

Safeguarded wharves

A network of sites that have been safeguarded for cargo handling uses such as intraport or transhipment movements and freight-related purposes by Safeguarding Directions. A site remains safeguarded unless and until the relevant Safeguarding Direction is formally removed or amended.

Scheduled flights

Regular commercial flights operating to a timetable and responsible for carrying the overwhelming majority of passengers and freight travelling to or from London by air.

Secondary commercial property

See prime, secondary and tertiary property.

Secondary heat

To recover useful energy, in the form of heat, from sources where processes or activities produce heat which is normally wasted (for example recovering heat from the Underground network) or from heat that exists naturally within the environment (air, ground and water).

Secondary materials (waste)

Waste materials that can be used in reuse, recycling and re-manufacturing processes instead of or alongside virgin raw materials. This can include waste materials from demolition and excavation, or discarded items such as furniture and electrical products.

Section 106 agreements

These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.

Self-sufficiency

In relation to waste, this means dealing with wastes within the administrative region where they are produced.

Sequential approach

Planning policies that require particular steps to be taken, or types of location or sites to be considered, in a particular order of preference. For example, retail, commercial and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are or can be well integrated with the existing centre and public transport.

Serviced accommodation

In the context of visitor accommodation this includes hotels, bed & breakfasts, guest houses, and hostels where services such as catering and cleaning are provided to guests.

Setting of a heritage asset

Is the surrounding in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Shopmobility

A scheme that lends manual and powered wheelchairs and mobility scooters to members of the public allowing people who require the use of these facilities to travel to and visit, independently and with greater ease, local shops, leisure services and commercial facilities usually within a town or shopping centre.

Significance (heritage)

The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

Site of Importance for Nature Conservation (SINC)

Areas of land chosen to represent the best wildlife habitats in London and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. Unlike SSSIs (see below), SINCs are not legally protected, but their value

must be considered in any land use planning decision. Procedures for the identification of SINCs are set out in Appendix 5 of the Mayor's London Environment Strategy.

Site of Special Scientific Interest (SSSI)

Areas of land with ecological or geological interest of national importance. They are designated by Natural England under the Wildlife and Countryside Act (1981 as amended) and have legal protection.

Smart infrastructure

Infrastructure, such as sensors, that produce, analyse and help to securely share data on the performance of the built and natural environment, as opposed to data purely on economic or social performance.

Social infrastructure

Covers facilities such as health provision, early years provision, schools, colleges and universities, community, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.

Soundscape

The overall quality of an acoustic environment as a place for human experience. Soundscape design might include preserving, reducing or eliminating certain sounds or combining and balancing sounds to create or enhance an attractive and stimulating acoustic environment.

Spatial Development Strategy

The London Plan is the statutory spatial development strategy for the Greater London area that is prepared by the Mayor.

Special Areas of Conservation

Designated under the EC Habitats Directive (1992), areas identified as best representing the range and variety within the EU of habitats and (non-bird) species.

Special Policy Areas

Areas that are defined locally particularly where development pressures and market conditions could lead to the loss of valued specialist clusters of uses or functions identified as having particular significance to London's unique identity, economic function or cultural heritage.

Special Protection Areas

Designated under the EC Birds Directive (1979), areas of the most important habitat for rare and migratory birds within the EU.

Strategic Areas for Regeneration

These areas are the Census Local Super Output Areas (LSOAs) in greatest socio-economic need. They fall within the 20 per cent most deprived LSOAs in England, using the Index of Multiple Deprivation.

Strategic developments (applications referable to the Mayor)

The planning applications that must be referred to the Mayor under the Town and Country Planning (Mayor of London) Order 2008 and any amendments thereto.

Strategic Environmental Assessment

Required under the European Directive 2001/42/EC, which has been transposed into UK Law through the Environmental Assessment of Plans and Programmes Regulations 2004. Strategic Environmental Assessment seeks to contribute to the integration of environmental considerations into the preparation and adoption of plans to promote sustainable development.

Strategic Industrial Locations

London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.

Strategic views

Views seen from places that are publicly accessible and well used and make a significant contribution to the image and character of London at the strategic level. They include significant buildings or urban landscapes that help to define London at a strategic level.

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Strategically Important Landmarks

A prominent building or structure in the townscape, which has visual prominence, provides a geographical or cultural orientation point and is aesthetically attractive through visibility from a wider area or through contrast with objects or buildings close by.

Supplementary Planning Guidance (SPG)

Gives guidance on the implementation of policies in the London Plan.

Sustainability Appraisal

A process of considering ways by which a Development Plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. Sustainability Appraisal is required by the Planning and Compulsory Purchase Act 2004.

Sustainable drainage systems

Using sustainable drainage techniques and managing surface water run-off from buildings and hardstandings in a way that reduces the total volume, flow and rate of surface water that runs directly into drains and sewers.

T

Tech City

Technology district in East London incorporating Old Street, Shoreditch, Aldgate, Whitechapel and corridors to Dalston and Hackney Central.

Tertiary commercial property

See prime, secondary and tertiary commercial property.

Thames Policy Area

A special policy area to be defined by boroughs in which detailed appraisals of the riverside will be required.

Thameslink

A National Rail cross-London link.

Town Centres

Places in London that provide access to a range of commercial, cultural and civic activities, including shopping, leisure, employment, entertainment, culture, and social and community facilities. Town centres are classified in the London Plan according to their existing role and function in light of characteristics such as scale, mix of uses, economic performance and accessibility – see Annex 1.

Townscape Views

Designated views which focus on architecturally and culturally important groups of buildings that can be enjoyed from well managed public spaces.

Transport Assessment

This is prepared and submitted alongside planning applications for developments likely to have significant transport implications. For major proposals, assessments should illustrate the following: accessibility to the site by all modes; the likely modal split of journeys to and from the site; and proposed measures to improve access by public transport, walking and cycling.

Transport for London (TfL)

One of the GLA group of organisations, accountable to the Mayor, with responsibility for delivering an integrated and sustainable transport strategy for London.

U

Urban greening

Urban greening describes the act of adding green infrastructure elements Due to the morphology and density of the built environment in London, green roofs, street trees, and additional vegetation are the most appropriate elements of green infrastructure in the city.

Urban Greening Factor

A land-use planning tool to help determine the amount of greening required in new developments.

Urban heat island

The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, the centre of London can be up to 10°C warmer than the rural areas around the city. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.

V

Viability Assessment

An assessment of the financial viability of a development to determine the maximum level of affordable housing and other policy requirements where relevant to be undertaken in line with the methodology and approach set out in Policy H5 Threshold approach to applications and the Mayor's Affordable Housing and Viability SPG.

Viability Review Mechanism

A review of development viability defined with a Section 106 agreement enabling the reassessment of development viability after permission has been granted, at an early, mid or late stage in the development process. These mechanisms address uncertainties in the application stage assessment of viability to enable the maximum level of affordable housing provision over the lifetime of a proposal.

Visitor accommodation

Leisure and business accommodation that provides temporary overnight accommodation on a commercial basis, including serviced accommodation such as hotels, bed and breakfast, guesthouses, hostels and campus accommodation, and non-serviced accommodation such as self-catering apart-hotels, caravans and camping.

W

Water space

See Blue/water space.

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Wider determinants of health

The wider determinants of health are a diverse range of social, economic and environmental factors which impact on people's health and life expectancy. They include transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks.

Wider South East

East of England, South East of England and London taken together. Collaboration arrangements have been established at this strategic level.

Whole life-cycle carbon

Whole life-cycle carbon emissions are the total greenhouse gas emissions arising from a development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/ construction, operation, maintenance and eventual material disposal.

X

No entries

Y

No entries

Z

Zero-carbon

Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere.

Zero-emission

Activity that causes no release of air pollutants and carbon dioxide or other greenhouse gases.