MAYOR OF LONDON

THE LONDON PLAN

THE SPATIAL DEVELOPMENT STRATEGY FOR GREATER LONDON

DRAFT FOR PUBLIC CONSULTATION

DECEMBER 2017



The London Plan

The Spatial Development Strategy for Greater London

Draft for public consultation

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HOW TO GIVE YOUR VIEWS

This new draft London Plan (the Spatial Development Strategy for Greater London) is published for consultation and your comments are invited. You can also view this document online at www.london.gov.uk/new-london-plan

Please note you can submit your comments online through a consultation tool at www.london.gov.uk/new-london-plan

Please reference your comments to the relevant policy or paragraph of the document.

All comments must be received by 5pm on Friday 2nd March 2018. They should either be submitted via the online consultation tool or sent to:

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Comments can also be emailed to LondonPlan@london.gov.uk with 'New Draft London Plan' as the title.

Please note, if you send in a response via the online consultation or email it is not necessary for you also to send in a hard copy.

All representations will be made available for public inspection.

MAIN CONTENTS

Introducing the Plan 1

Chapter 1 Planning London's Future (Good Growth Policies) 9

Policy GG1 Building strong and inclusive communities 13
Policy GG2 Making the best use of land 15
Policy GG3 Creating a healthy city 17
Policy GG4 Delivering the homes Londoners need 19
Policy GG5 Growing a good economy 21
Policy GG6 Increasing efficiency and resilience 23

Chapter 2 Spatial Development Patterns 25

Policy SD1 Opportunity Areas 28
Policy SD2 Collaboration in the Wider South East 57
Policy SD3 Growth locations in the Wider South East and beyond 61
Policy SD4 The Central Activities Zone (CAZ) 66
Policy SD5 Offices, other strategic functions and residential development in the CAZ 75
Policy SD6 Town centres 78
Policy SD7 Town centre network 81
Policy SD8 Town centres: development principles and Development Plan Documents 86
Policy SD9 Town centres: Local partnerships and implementation 90
Policy SD10 Strategic and local regeneration 92

Chapter 3 Design 97

Policy D1 London's form and characteristics 98
Policy D2 Delivering good design 102
Policy D3 Inclusive design 106
Policy D4 Housing quality and standards 109
Policy D5 Accessible housing 115
Policy D6 Optimising housing density 117
Policy D7 Public realm 122
Policy D8 Tall buildings 126
Policy D9 Basement development 131
Policy D10 Safety, security and resilience to emergency 132
Policy D11 Fire safety 134

Policy D12 Agent of Change 136
Policy D13 Noise 139

Chapter 4 Housing 143

Policy H1 Increasing housing supply 144
Policy H2 Small sites 152
Policy H3 Monitoring housing targets 159
Policy H4 Meanwhile use 160
Policy H5 Delivering affordable housing 161
Policy H6 Threshold approach to applications 164
Policy H7 Affordable housing tenure 169
Policy H8 Monitoring of affordable housing 173
Policy H9 Vacant building credit 174
Policy H10 Redevelopment of existing housing and estate regeneration 175
Policy H11 Ensuring the best use of stock 177
Policy H12 Housing size mix 178
Policy H13 Build to Rent 180
Policy H14 Supported and specialised accommodation 185
Policy H15 Specialist older persons housing 186
Policy H16 Gypsy and Traveller accommodation 190
Policy H17 Purpose-built student accommodation 193
Policy H18 Large-scale purpose-built shared living 197

Chapter 5 Social Infrastructure 201

Policy S1 Developing London's social infrastructure 202
Policy S2 Health and social care facilities 204
Policy S3 Education and childcare facilities 208
Policy S4 Play and informal recreation 212
Policy S5 Sports and recreation facilities 214
Policy S6 Public toilets 218
Policy S7 Burial space 219

Chapter 6 Economy 223

Policy E1 Offices 224
Policy E2 Low-cost business space 227
Policy E3 Affordable workspace 230
Policy E4 Land for industry, logistics and services to support London's economic function 232
Policy E5 Strategic Industrial Locations (SIL) 239

Policy E6 Locally Significant Industrial Sites 245
Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function 246
Policy E8 Sector growth opportunities and clusters 252
Policy E9 Retail, markets and hot food takeaways 256
Policy E10 Visitor infrastructure 261
Policy E11 Skills and opportunities for all 263

Chapter 7 Heritage and Culture 267

Policy HC1 Heritage conservation and growth 268
Policy HC2 World Heritage Sites 278
Policy HC3 Strategic and Local Views 280
Policy HC4 London View Management Framework 285
Policy HC5 Supporting London's culture and creative industries 287
Policy HC6 Supporting the night-time economy 292
Policy HC7 Protecting public houses 297

Chapter 8 Green Infrastructure and Natural Environment 301

Policy G1 Green infrastructure 302
Policy G2 London's Green Belt 303
Policy G3 Metropolitan Open Land 304
Policy G4 Local green and open space 305
Policy G5 Urban greening 308
Policy G6 Biodiversity and access to nature 311
Policy G7 Trees and woodlands 313
Policy G8 Food growing 315
Policy G9 Geodiversity 316

Chapter 9 Sustainable Infrastructure 319

Policy SI1 Improving air quality 320
Policy SI2 Minimising greenhouse gas emissions 324
Policy SI3 Energy infrastructure 329
Policy SI4 Managing heat risk 334
Policy SI5 Water infrastructure 336
Policy SI6 Digital connectivity infrastructure 341
Policy SI7 Reducing waste and supporting the circular economy 344
Policy SI8 Waste capacity and net waste self-sufficiency 347
Policy SI9 Safeguarded waste sites 355
Policy SI10 Aggregates 356

Policy SI11 Hydraulic fracturing (Fracking) 358
Policy SI12 Flood risk management 359
Policy SI13 Sustainable drainage 361
Policy SI14 Waterways – strategic role 363
Policy SI15 Water transport 368
Policy SI16 Waterways – use and enjoyment 371
Policy SI17 Protecting London's waterways 373

Chapter 10 Transport 401

Policy T1 Strategic approach to transport 402
Policy T2 Healthy Streets 403
Policy T3 Transport capacity, connectivity and safeguarding 406
Policy T4 Assessing and mitigating transport impacts 412
Policy T5 Cycling 414
Policy T6 Car parking 420
Policy T6.1 Residential parking 423
Policy T6.2 Office parking 426
Policy T6.3 Retail parking 427
Policy T6.4 Hotel and leisure uses parking 428
Policy T6.5 Non-residential disabled persons parking 429
Policy T7 Freight and servicing 430
Policy T8 Aviation 433
Policy T9 Funding transport infrastructure through planning 436

Chapter 11 Funding the London Plan 439

Policy DF1 Delivery of the Plan and Planning Obligations 441

Chapter 12 Monitoring 457

Policy M1 Monitoring 458

Annex 1 Town Centre Network 461

Annex 2 Inner and Outer London Boroughs 497

Annex 3 Glossary 501

FIGURES AND TABLES

Figure 2.1 - The Key Diagram 26
Figure 2.2 - OAPF process diagram 31
Figure 2.3 - Key to symbols on the growth area figures 33
Figure 2.4 - Bakerloo Line Extension (BLE) 34
Figure 2.5 - South West London/Crossrail 2 South 37
Figure 2.6 - Lee Valley, New Southgate and Wood Green/Crossrail 2 North 40
Figure 2.7 - Thames Estuary 44
Figure 2.8 - High Speed 2 / Thameslink 48
Figure 2.9 - Elizabeth Line East 50
Figure 2.10 - Elizabeth Line West 52
Figure 2.11 - Central London 54
Figure 2.12 - Tram Triangle 56
Figure 2.13 - Spatial Distribution of Commuting to London 60
Figure 2.14 - Average annual gross migration flows 2016 – 2041 61
Figure 2.15 - Wider South East – 13 Initial Strategic Infrastructure Priorities 64
Figure 2.16 - CAZ Diagram 72
Figure 2.17 - Town Centre Network 83
Figure 2.18 - Town centre classifications 84
Figure 2.19 - Strategic Areas for Regeneration (based on 20 per cent most deprived lower super output areas in England) 95
Figure 3.1 - Circular economy hierarchy for building approaches 101
Table 3.1 - Minimum space standards for new dwellings 111
Table 4.1 - 10 year targets for net housing completions (2019/20 -2028/29) 146
Figure 4.1 - 10 Year Housing Target for Net Completions 147
Figure 4.2 - Public Transport Access Levels 151
Table 4.2 - 10 year targets (2019/20 -2028/29) for net housing completions on small sites (below 0.25 hectares in size) 156
Figure 4.3 - Proximity to town centres 158
Table 4.3 - 2017 SHMA findings 171
Table 4.4 - Annual borough benchmarks for specialist older persons housing (C3) 2017-2029 189
Figure 5.1 - Walk London Network 217

Table 6.1 - Projected office employment and floorspace demand 2016-2041 226
Table 6.2 - Management of industrial floorspace capacity - industrial property market area and borough-level categorisations 237
Figure 6.1 - Management of industrial floorspace capacity - industrial property market area and borough level categorisations 238
Figure 6.2 - Strategic Industrial Locations 241
Table 6.3 - Strategic Industrial Locations 242
Figure 6.3 - Simplified illustrations of approaches to SIL/LSIS consolidation 251
Figure 7.1 - Listed Buildings, Scheduled Monuments and World Heritage Sites 270
Figure 7.2 - London's Conservation Areas 271
Figure 7.3 - London's Waterways and Registered Historic Parks & Gardens 272
Figure 7.4 - Outline Character Map of London 275
Figure 7.5 - Archaeological Priority Areas and Registered Battlefield 277
Table 7.1 - Designated Strategic Views 282
Figure 7.6 - Designated Strategic Views 284
Figure 7.7 - Town centres and night-time economy roles – distinguishing those of international, sub-regional and more than local importance 296
Table 8.1 - Public open space categorisation 307
Table 8.2 - Urban Greening Factors 310
Figure 8.1 - Geodiversity sites 318
Figure 9.1 - Air Quality Focus Areas 323
Figure 9.2 - The energy hierarchy and associated targets 326
Figure 9.3 - Heat Network Priority Areas 332
Figure 9.4 - Spatial illustration of the wastewater drainage capacity across London 340
Figure 9.5 - Broadband speed 2016 343
Table 9.1 - Forecast arisings of Household and Commercial & Industrial waste by borough 2021-2041 (000's tonnes) 349
Table 9.2 - Borough-level apportionments of Household and Commercial & Industrial waste 2021-2041 (000's tonnes) 350
Table 9.3 - Projected exports of Household and Commercial & Industrial waste from London (000's tonnes) 351
Figure 9.6 - London's Network of Waterways 364
Figure 9.7 - Thames Policy Areas 366
Figure 10.1 - The Ten Healthy Streets Indicators 405
Table 10.1 - Indicative list of transport schemes 407

Table 10.2 - Minimum cycle parking standards 415
Figure 10.2 - Areas where higher minimum cycle parking standards apply 418
Table 10.3 - Maximum residential parking standards 424
Table 10.4 - Maximum office parking standards 427
Table 10.5 - Maximum retail parking standards 428
Table 10.6 - Non-residential disabled persons parking standards 430
Table 12.1 - Key Performance Indicators and Measures 458

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 shapes their 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 reflected the policies and issues on which I was elected by the people of this great city, has been a major priority for my administration. 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. And 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 10.5 million in 2041. This means that just to meet demand, at least 66,000 new homes need to be built – along with space for tens of thousands of new jobs – every single year.

Preparing to deal 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 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. We let down future generations if we do not properly plan for accommodating growth in a way which is environmentally, economically and socially sustainable.

So this London Plan sets out a new way of doing things, something I am calling 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 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 have always been honest with Londoners that it's going to be a marathon, not a sprint. But we are already making progress and this plan underscores my determination 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 the housing we need – with the goal of roughly doubling the current rate of homebuilding. 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 my 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, spawning new and exciting opportunities for Londoners and helping to deliver my wider vision for our city.

Through this London Plan, I want to build 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 is 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

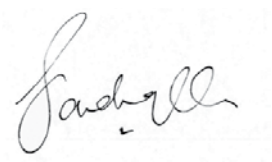
access to great culture is built into the fabric of every part of London, with our rich heritage and cultural offer supporting our growing world-class creative industries.

I also see the London Plan 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. I envisage London as 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 when I look to the future, I see London as a city with clean air for our children to breath, 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.

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. This new approach sets us up for some exciting and innovative times ahead as our population grows. 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



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 must goes through before it is formally published.

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 supporting detailed regulations. The 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 this strategy, 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 legislation and policy instruments like the European Spatial Development Perspective
- 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, gender, age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment
- the specific requirements of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000.

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

- Transport
- Environment
- Economic Development
- Housing
- Culture
- Health and Health Inequalities.

0.0.8 The draft Plan has been developed alongside the Mayor's other statutory strategies to ensure consistency with those strategies.

0.0.9 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 London. Planning applications should be determined in accordance with it, unless there are sound planning reasons (other material considerations) which indicate otherwise. The Plan provides the strategic, London-wide policy context for borough local development plan documents; all local development plan documents and Neighbourhood Plans have to be 'in general conformity' with the London Plan.

How to use the document

0.0.10 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. When the 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.

0.0.11 This Plan 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.

0.0.12 The 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 Plan (including those discussed above) and the various issues that European and national legislation requires to be considered
- other requirements of planning law and 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).

0.0.13 The final Plan will also take account of the comments received during the consultation process and the recommendations of the panel that conduct the Examination in Public (see Next Steps).

0.0.14 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 housing targets are set only for the first ten years of the Plan. This reflects the dynamic nature of London's land market and means that there will need to be a review of the housing targets before 2029. Other elements of the Plan will need to be updated over time through Supplementary Planning Guidance as part of the 'plan, monitor, manage' approach[4].

[4] The draft Plan is underpinned by housing and economic projections. These projections are based on past trends. Monitoring this sort of information and the implementation of the Plan identifies when policies may need to be reviewed and changed.

0.0.15 To help the reader navigate through the 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 Plan (also known as a Replacement Plan). This means it is not an alteration or update to previous Plans. This Plan will be the third London Plan, the previous ones being the 2004 Plan produced by former Mayor of London Ken Livingstone and the 2011 Plan produced by former Mayor of London Boris Johnson. All of the other iterations of the London Plan from 2004-2016 have been alterations. Once adopted this Plan will replace all previous versions.

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

0.0.19 As well as taking account of the relevant legislation, regulations and Government policy, this 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 polices in the Plan have been developed over a number of months and are supported by a proportionate evidence base[5]. In their development, the Mayor has had regard to the need to ensure consistency with national policies, but does not seek to repeat them. Instead the London Plan seeks to develop an approach tailored for London, and act as the key document shaping planning decisions across the capital. On some occasions, the Plan deviates from existing national policy and guidance; this is mainly where the Plan is delivering on a specific Mayoral commitment and reflects the particular circumstances of London. The scale of the Mayor's election victory provides a significant political mandate to use the planning system to deliver his manifesto commitments.

5 https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/full-review-evidence-base

0.0.21 The drafting of the Plan aims to ensure that London is ready to implement this ambitious Plan as soon as possible and that the policies do not take years to implement due to the time it can take to update local development plan documents. As the London Plan is part of every borough's development plan, there is no requirement for the policies to be repeated at the local level before they can be implemented. However, in some instances a local approach is required within the context of the overall policy. The Plan clearly sets out where this is the case.

0.0.22 This Plan provides the framework to address the key planning issues facing London. This allows 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.

0.0.23 It is crucial that all those involved in planning and development in London understand how London's two-tier planning system works and do not seek to duplicate policy or evidence unnecessarily.

0.0.24 The Mayor is legally required to keep the London Plan under review[6]. The Key Performance Indicators 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.

A City for all Londoners

0.0.25 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.

0.0.26 The document was put out to consultation and the feedback from it has 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.

6 GLA Act 1999, section 339(1)

Integrated Impact Assessment

0.0.27 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 polices with one integrated process. The IIA incorporates the statutory requirements of:

- Strategic Environmental Assessment
- Sustainability Appraisal
- Equalities Impact Assessment
- Health Impact Assessment
- Community Safety Impact Assessment

0.0.28 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 new London Plan ensuring that these key issues have been taken into account throughout the development process.

Structure of the Plan

0.0.29 Chapter one sets out six core 'good growth' policies which should be taken into account for all planning and development in London. These policies represent the overarching objectives of the Plan.

0.0.30 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.

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

- Chapter 3 Design
- Chapter 4 Housing
- Chapter 3Chapter 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

Next Steps

0.0.32 Following the close of the consultation period, the next formal step will be the holding of the Examination in Public (EiP). This will be led by an independent panel, who will review the comments received during the consultation on the draft London Plan and will decide:

- which issues will be discussed at the EiP
- who will be invited to take part

0.0.33 The EiP is a hearing based around a detailed discussion of selected subjects covered by the new draft London Plan. It is likely to be held in the autumn of 2018. After it is completed, the Panel will produce a report recommending changes to the Plan for the Mayor's consideration, which the Mayor can decide to accept or reject. Once the Mayor has decided which of the suggested changes he intends to accept, he will send a revised draft Plan to the Secretary of State for Communities and Local Government. They then have six weeks to decide whether or not they wish to direct that any changes should be made. Assuming the Secretary of State decides not to make a direction, the Mayor is required to lay a copy of the draft proposals before the London Assembly, which has 21 days to decide whether to reject it in its entirety (rejection requires two thirds of those voting in favour). Provided the London Assembly does not decide to reject the Plan, the Mayor can then publish the London Plan.

Chapter 1

Planning London's Future (Good Growth Policies)



1.0.1 London's growth and development is shaped by the decisions that are made every day by planners, planning applicants and decision-makers 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.

1.0.2 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.

1.0.3 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. By setting a new level of ambition for the people who make all of London's planning decisions, this London Plan will create a better city for all Londoners.

Planning for Good Growth

1.0.4 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.

1.0.5 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.

1.0.6 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.

1.0.7 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.

1.0.8 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.

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

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

1.0.10 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 for these communities – both existing and new - helping them to flourish and making new connections between them.

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 and 1.2 million disabled people. The success of London's communities relies upon this diversity. To keep them strong, London must remain open and inclusive, allowing everyone to share in and contribute towards the city's success.

1.1.3 This will not be easy. 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 workspace in accessible locations, 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 the full diversity of its inhabitants.

Policy GG1 Building strong and inclusive communities

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 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 and more equal city.

B Provide access to good quality services and amenities that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation.

C Ensure that streets and public spaces are 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 and community ownership, and where communities can develop and flourish.

D 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 face-to-face contact and social interaction during the daytime, evening and night time.

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

F Support the creation of a London where all Londoners, including older people, disabled people and people with young children 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.

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 and public transport 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 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. As new developments are designed, the special features that Londoners value about a place, such as cultural, historic or natural elements, can 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.

Policy GG2 Making the best use of land

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

A Prioritise the development of Opportunity Areas, brownfield land, surplus public sector land, sites which are well-connected by existing or planned Tube and rail stations, sites within and on the edge of town centres, and small sites.

B Proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design–led approach.

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

D Protect 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.

E 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.

F 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 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 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, and delivering Good Growth will involve prioritising health in all London's planning decisions.

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 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 of 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.

Policy 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 lifestyles 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 on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.

E Plan for improved access to green spaces and the provision of new green infrastructure.

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

G 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.

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. 270,000 homes are in the planning pipeline, but delivery is not keeping pace.

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 every available means. 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 There are a range of other measures that impact on the availability of homes. Existing homes must not be left empty, and have the potential to be brought back into use as affordable housing. The Build to Rent model can deliver homes for rent quickly. Boroughs should use all the tools at their disposal to ensure that homes are actually built after planning permissions are granted.

1.4.7 Delivering the housing London needs will be a huge challenge that will require everyone involved in the housing market to work together. Together 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.

Policy 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, including small 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

1.4.8 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.

1.4.9 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, pleasant environments that promote good health, 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.

1.4.10 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, supporting local regeneration. Reasonably-priced, good quality employment space will be needed across London to make this happen.

1.4.11 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.

1.4.12 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.

1.4.13 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.

Policy 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 Maximise 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.

Increasing efficiency and resilience

1.5.1 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.

1.5.2 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.

1.5.3 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 protecting against flood risk.

1.5.4 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, and the London Fire and Emergency Planning Authority.

1.5.5 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.

1.5.6 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.

1.5.7 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.

Policy 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, and avoiding contributing to the urban heat island effect.

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

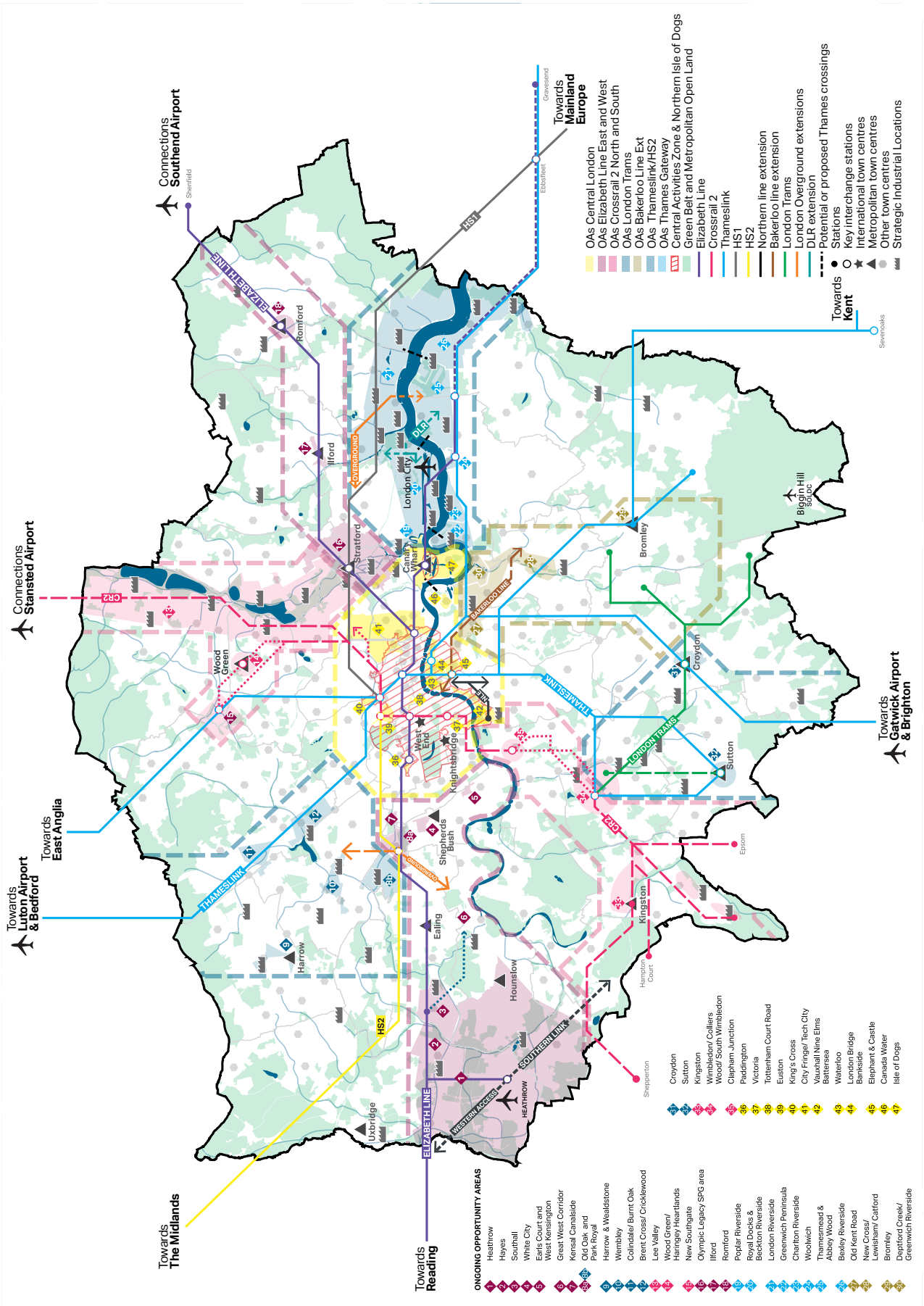
D Take an integrated approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

Chapter 2

Spatial Development Patterns



Figure 2.1 - The Key Diagram



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 a timely manner.
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, working with infrastructure providers where necessary

4) recognise that larger areas can define their own character and density

5) 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 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

6) meet or, where appropriate, exceed the indicative guidelines for housing and/or indicative estimates for employment capacity set out in Figures 2.4 to 2.12

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 subject to public and stakeholder consultation

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.

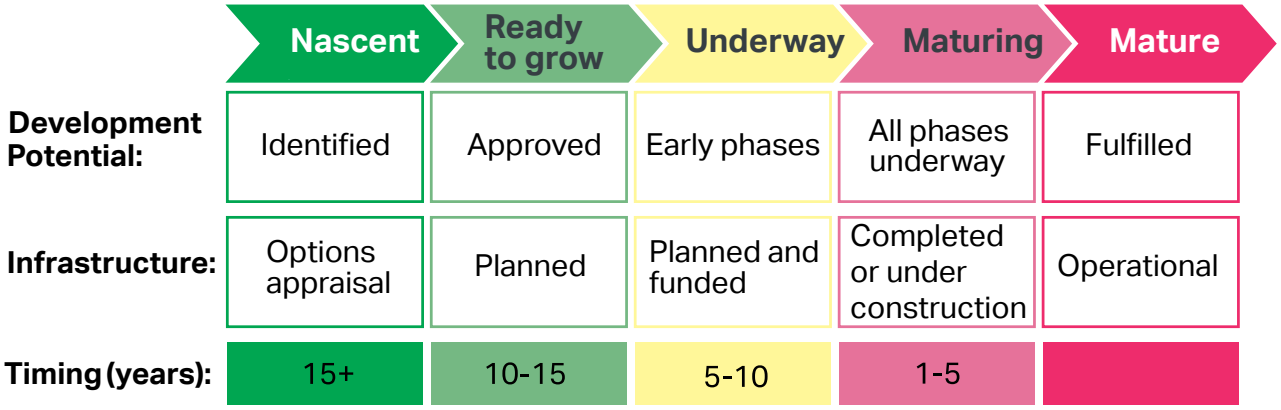
2.1.1 **Opportunity Areas** are the capital's most significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two.

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. 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.

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.

Figure 2.2 - OAPF process diagram



2.1.5 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.

2.1.6 Through the Mayor's Transport Strategy, the London Plan and other strategies, the Mayor has identified Opportunity Areas (OAs) set out in Figures 2.4 to 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 polices 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.

2.1.7 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.

Supporting London's growth

2.1.8 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.

2.1.9 The London Housing Strategy sets out four principal approaches:

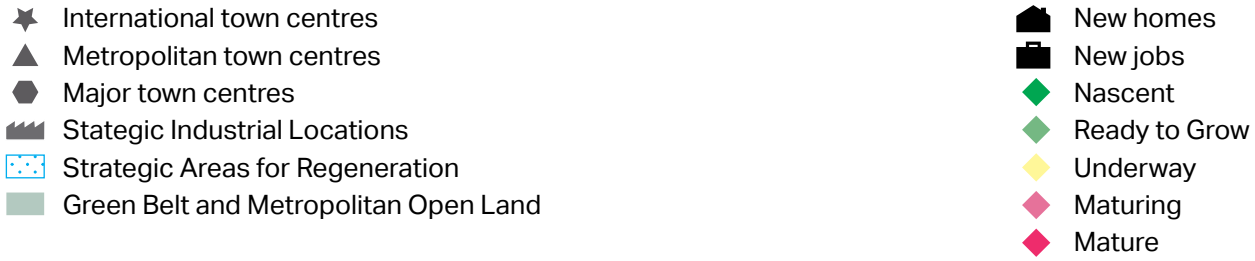
1. Land assembly, where the Mayor will both directly assemble land for development and support boroughs, Housing Associations and other homebuilders to do so. This may be through direct investment or through supporting compulsory purchase of appropriate land. He will also focus resources on areas where 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.

2.1.10 The Mayor's Transport Strategy seeks to ensure that dedicated 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 sets ambitious mode share targets.

2.1.11 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 the scheme. In order to support these priorities, the Plan sets out further guidance on these specific 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 will need to be phased in a way that maximises the benefits from major infrastructure and services investment whilst avoiding any unacceptable effects on existing infrastructure before the new infrastructure is available.

Figure 2.3 - Key to symbols on the growth area figures

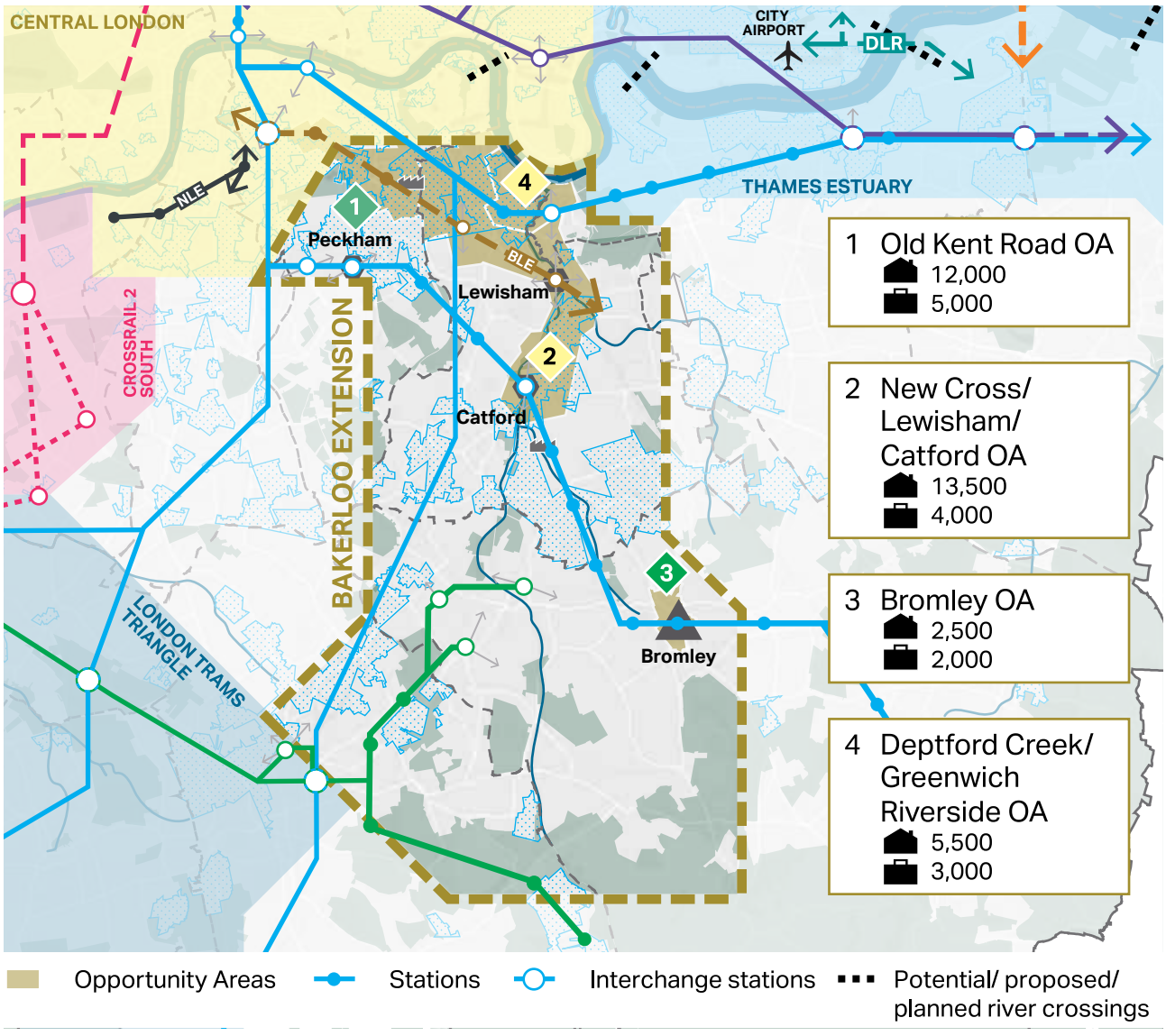


Bakerloo Line Extension

2.1.12 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.

2.1.13 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

2.1.14 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 plan for no net loss of industrial floorspace capacity and 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.

2.1.15 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

2.1.16 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 an extension of the Bakerloo Line 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 and the emerging artistic and cultural character. Development should improve north-south connections and pedestrian and cycling movement across the traffic dominated New Cross Road (A2) as well as connectivity between New Cross Gate and surrounding communities.

2.1.17 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.

2.1.18 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. 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

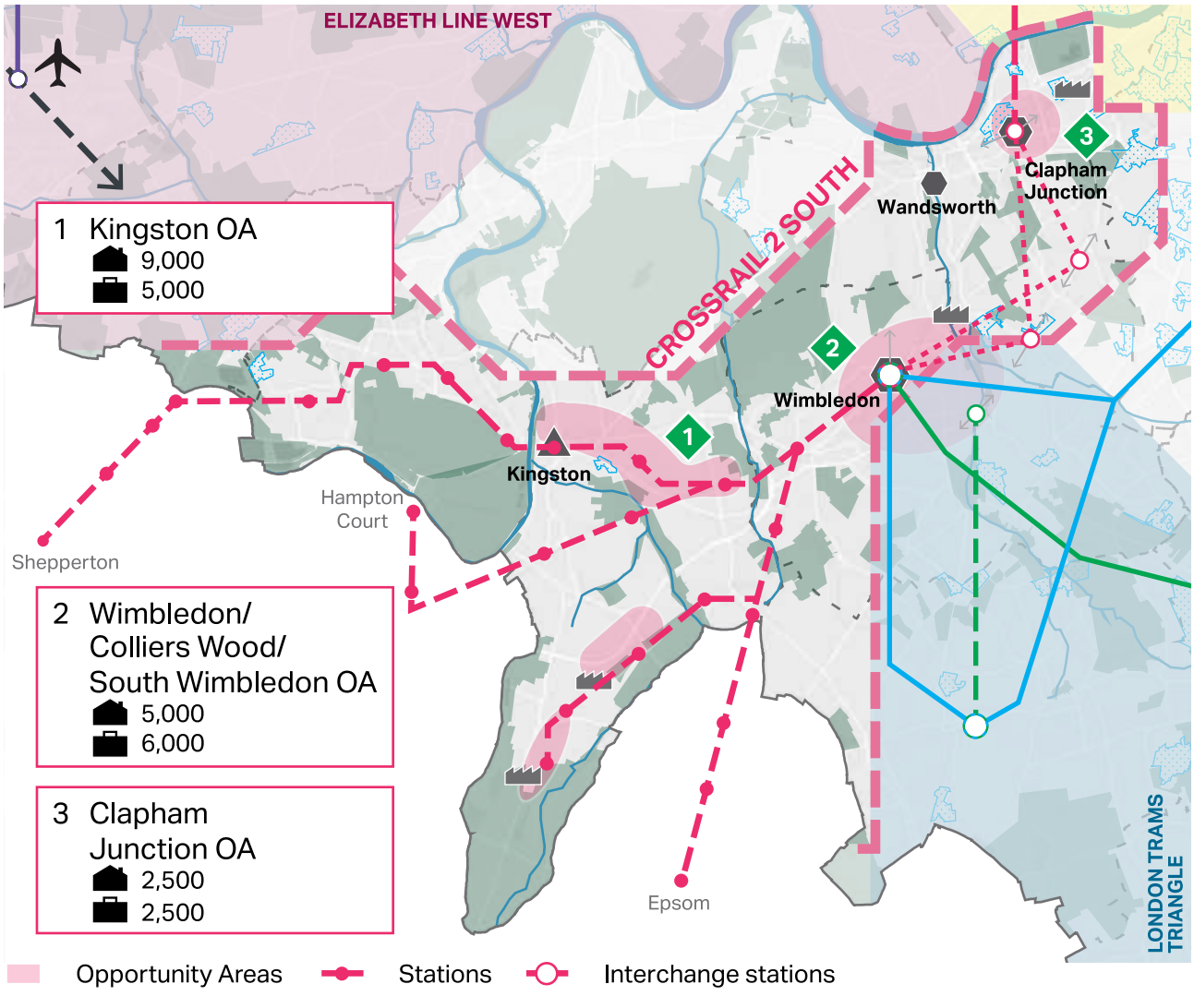
2.1.19 Crossrail 2 is a proposed new railway serving London and the Wider South East. To the south, it will connect the South West Mainline via new tunnels from Wimbledon, through central London to New Southgate and Tottenham Hale where it will connect with the West Anglia Mainline. As well as reducing 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.

2.1.20 It is anticipated that Crossrail 2 will be operational by 2033. 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.

2.1.21 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

2.1.22 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 Estate
- New Malden
- Tolworth

2.1.23 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.

2.1.24 In the longer term, and in line with the opening of Crossrail 2 in 2033, there may be potential to accommodate growth in the following areas:

- Berrylands and Hogsmill Valley
- Chessington

Wimbledon OA

2.1.25 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

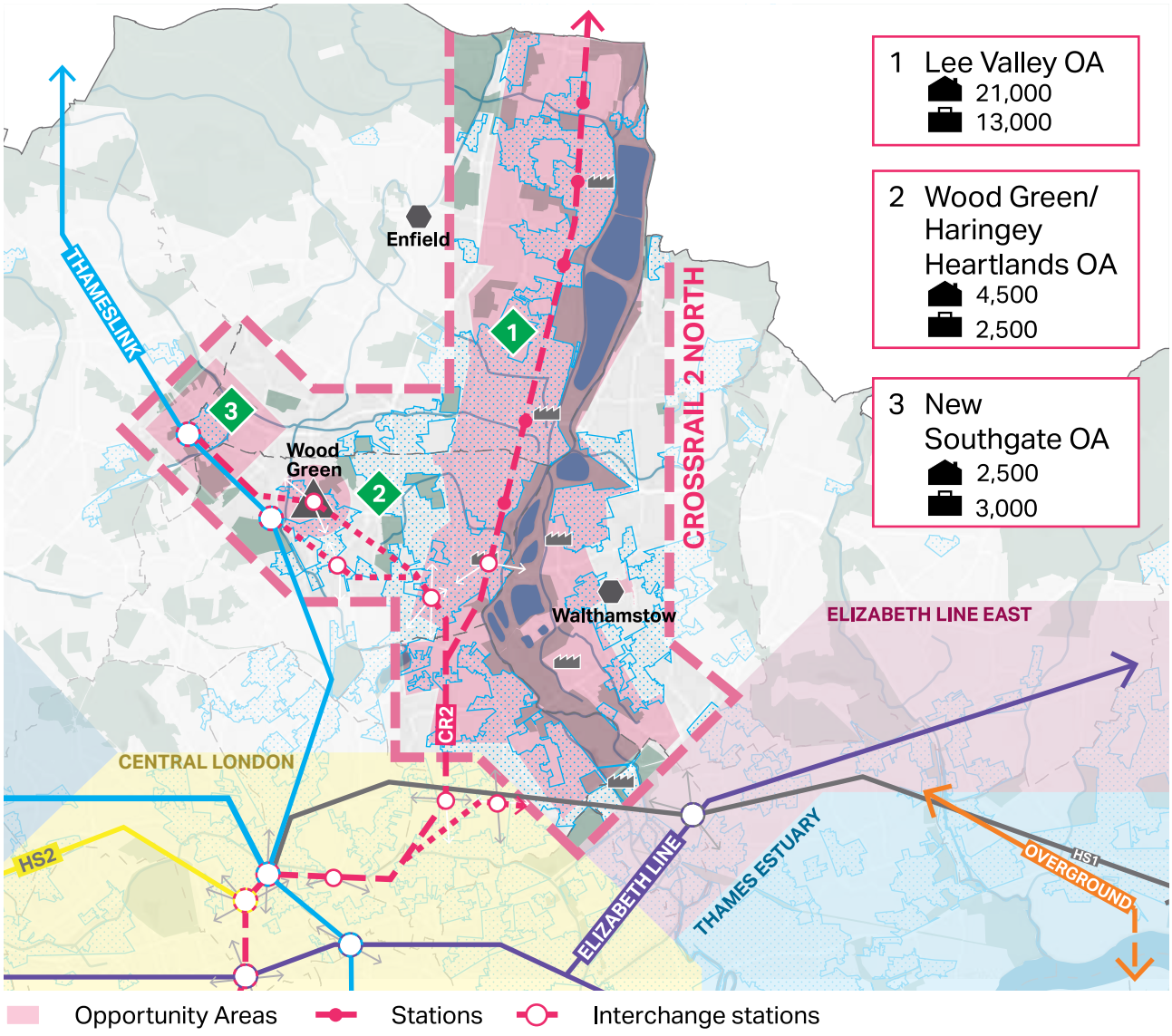
for speculative office development, helping to meet the Mayor's ambition to promote growth in employment in outer London centres. The planning framework should also explore and quantify the opportunities for development associated with Crossrail 2 in the surrounding area, and how the use of industrial land can be retained and intensified to make more efficient use of land.

Clapham Junction OA

2.1.26 Clapham Junction is Europe's busiest interchange station, and a designated Major town centre. 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. The station suffers from over-crowding at peak times, and requires significant investment to allow it to accommodate future growth in passenger numbers. 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

2.1.27 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 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.

2.1.28 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.

2.1.29 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.

2.1.30 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.

2.1.31 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, with no net loss of industrial floorspace capacity, 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

2.1.32 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.

2.1.33 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 Alexandra Park hold the key to comprehensive development.

New Southgate OA

2.1.34 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.

2.1.35 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.

2.1.36 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

2.1.37 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.

2.1.38 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.

2.1.39 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.

2.1.40 The Mayor will continue to work with the Thames Gateway Strategic Group, and the Thames Estuary Growth Commission, to support and promote investment in the Gateway, both within and outside London.

2.1.41 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:

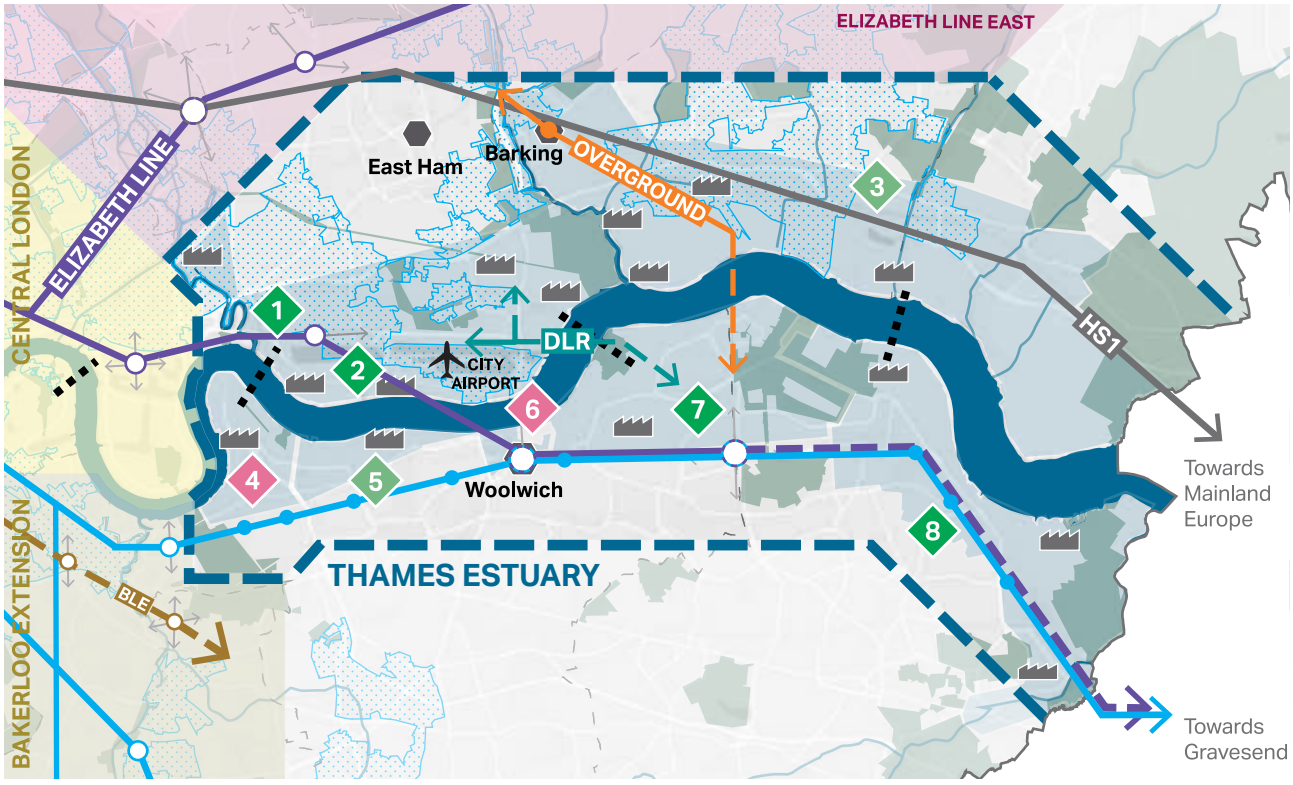
- Silvertown Tunnel
- a new river crossing linking Rotherhithe and Canary Wharf
- an extension of the DLR across the river from Gallions Reach to Thamesmead and beyond
- Barking Riverside to Abbey Wood London Overground crossing.

2.1.42 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.

2.1.43 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 — Stations — Interchange stations — Potential/ proposed/ planned river crossings

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

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

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

6 Woolwich OA
- 5,000
- 2,500

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

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

Poplar Riverside OA

2.1.44 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.

2.1.45 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

2.1.46 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.

2.1.47 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.

2.1.48 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.

2.1.49 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. 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.

2.1.50 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

2.1.51 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. The Planning Framework should ensure that there is no net loss of industrial floorspace capacity.

2.1.52 Alongside the opening of the Elizabeth Line in December 2018, 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

2.1.53 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.

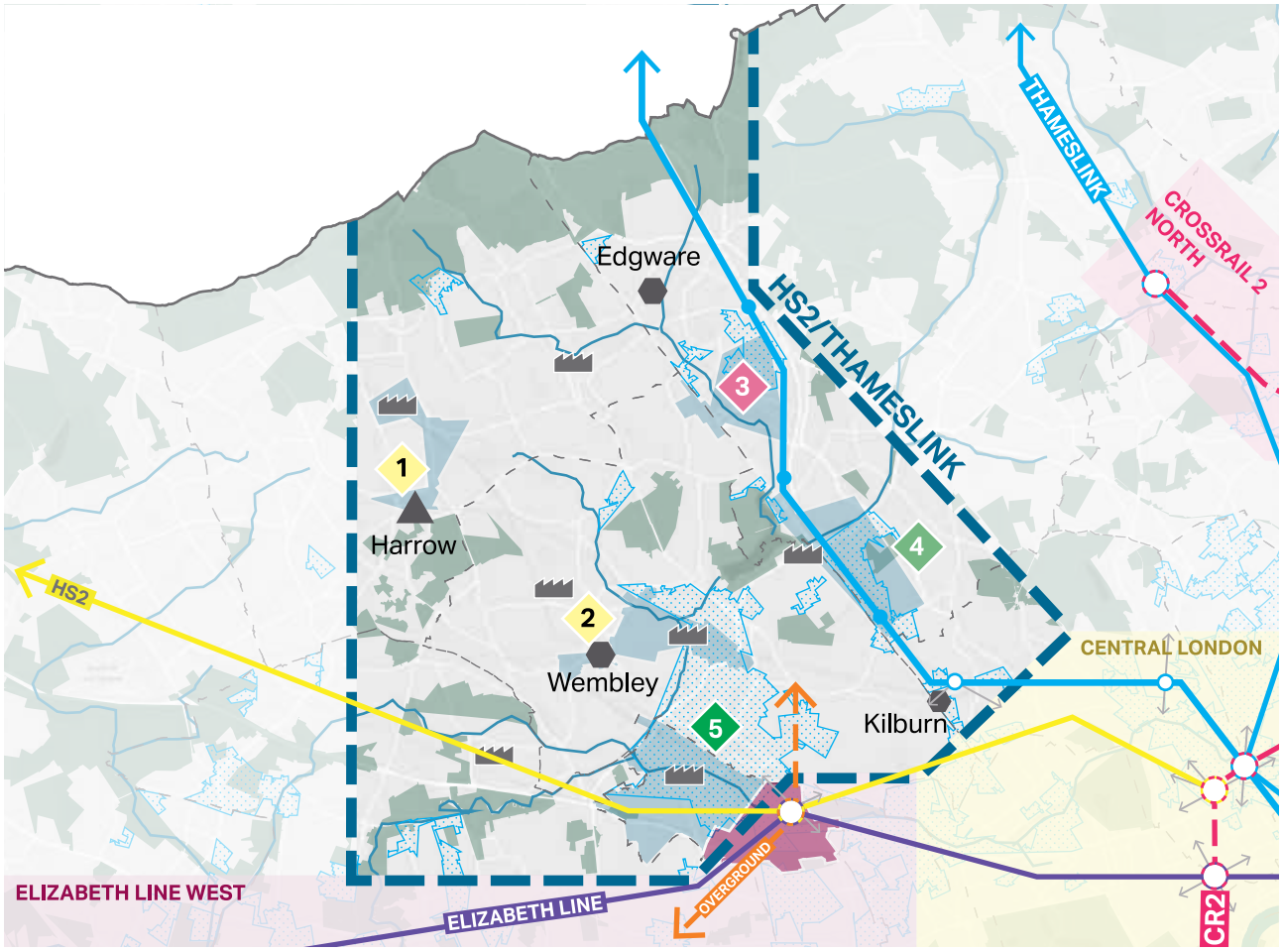
2.1.54 Industrial and logistics uses will continue to play a significant role in the area. The Planning Framework should ensure that there is no net loss of industrial floorspace capacity, and that industrial uses are retained and intensified, and form part of the mix in redevelopment proposals.

High Speed 2 / Thameslink

2.1.55 At the heart of this area, Old Oak is set to be transformed in 2026 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.

2.1.56 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 — 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

Old Oak / Park Royal

2.1.57 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.

2.1.58 Old Oak Common station (connecting HS2, the Elizabeth Line and National Rail) is set to open in 2026. 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.

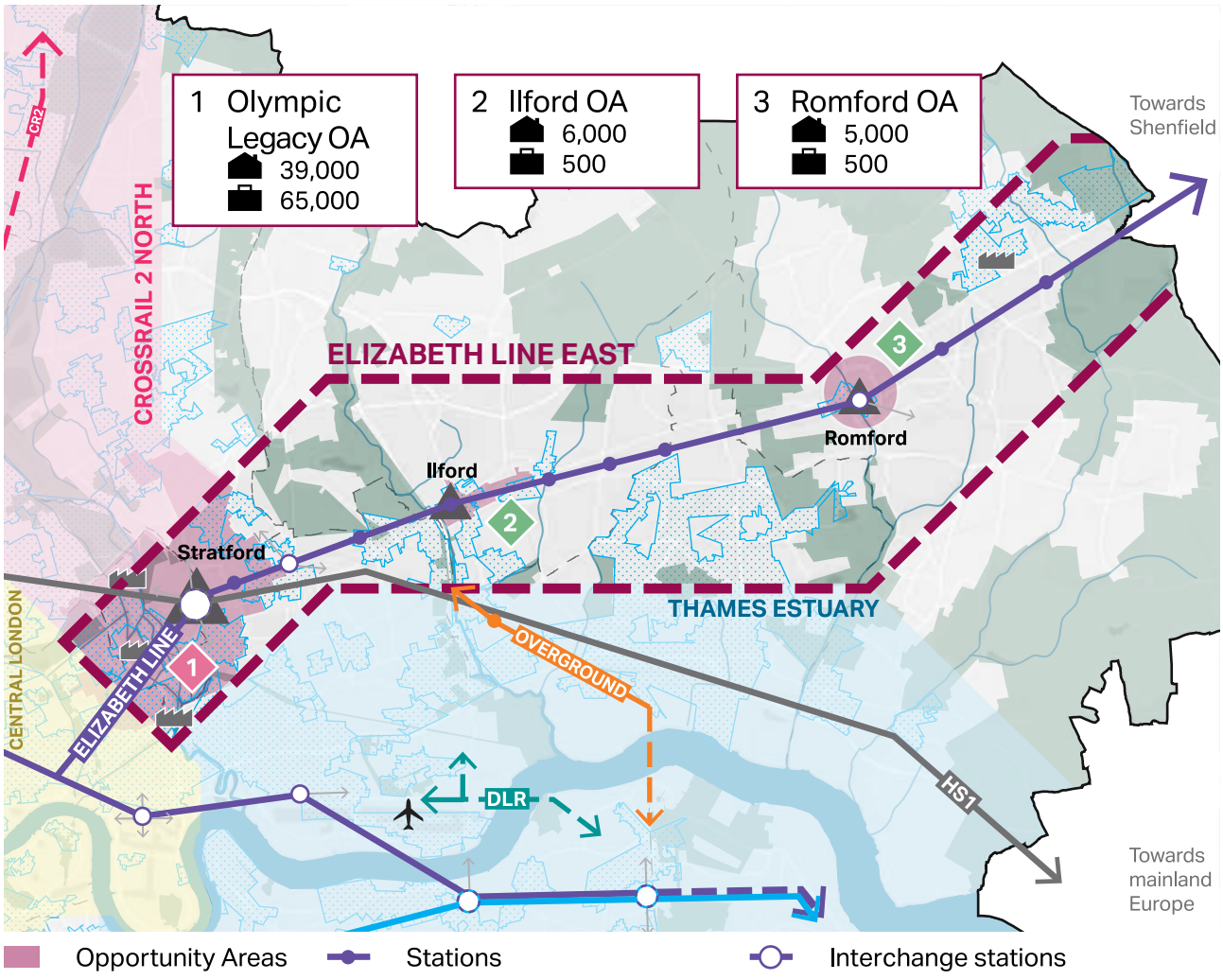
2.1.59 Park Royal is a strategically-important industrial estate for the functioning of London's economy and should be protected, strengthened and intensified.

Elizabeth Line East

2.1.60 The Elizabeth Line will open in 2019 and 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.

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

Figure 2.9 - Elizabeth Line East



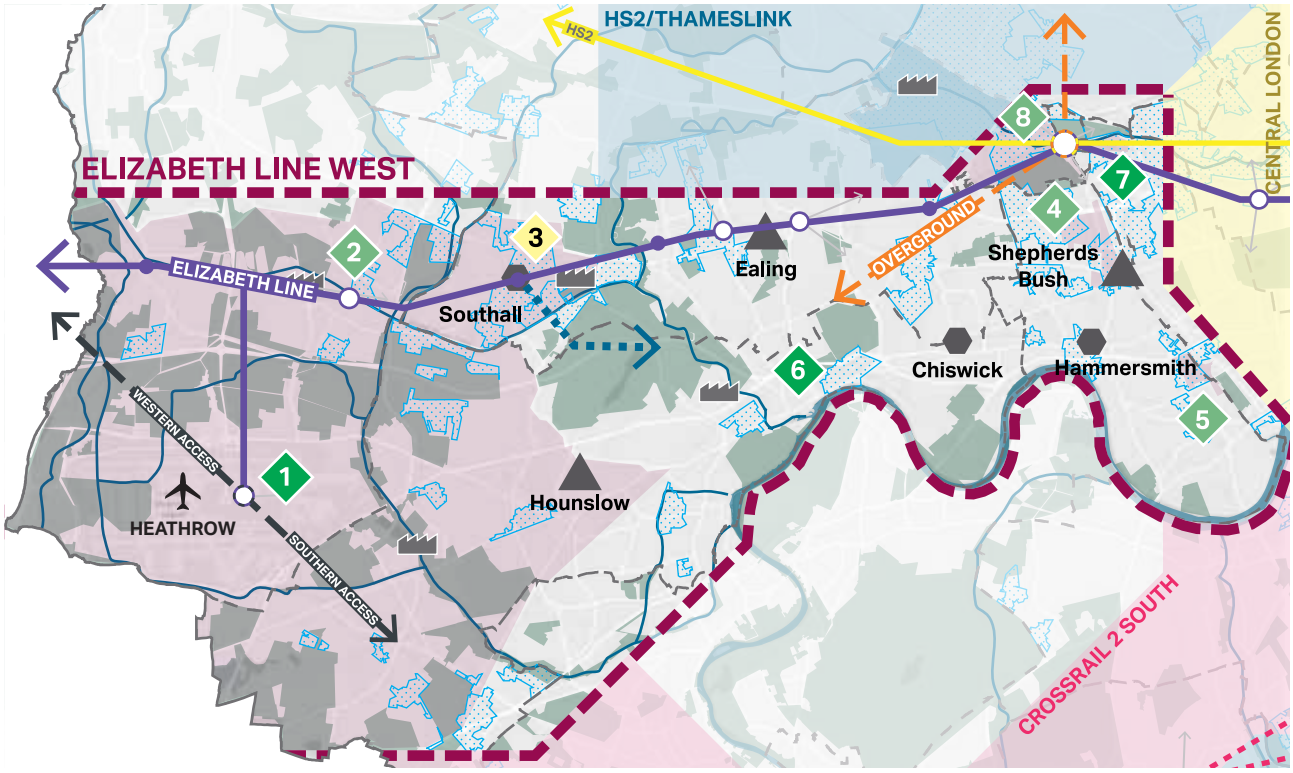
Heathrow/Elizabeth Line West

2.1.62 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.

2.1.63 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.

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

Figure 2.10 - Elizabeth Line West



Opportunity Areas — 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
- 6,000
- 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

Central London

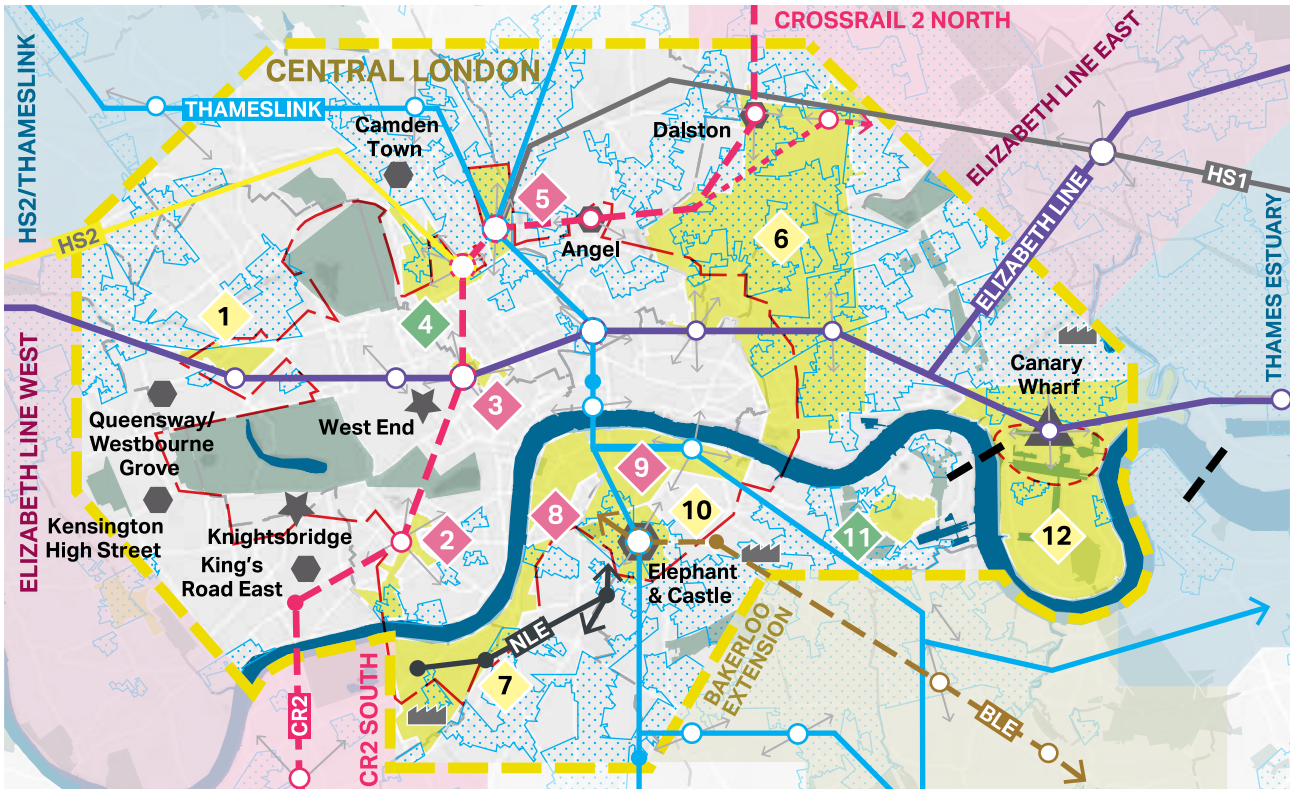
2.1.65 Central London is a key driver for both London's economy and the UK economy as a whole, comprising both the CAZ and Northern Isle of Dogs (see Policy SD4 The Central Activities Zone (CAZ) and Policy SD5 Offices, other strategic functions and residential development in the CAZ) and the closely 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

2.1.66 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.

2.1.67 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 | Stations | Interchanges | 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
- 16,500

5 King's Cross OA
- 1,000
- 48,000

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

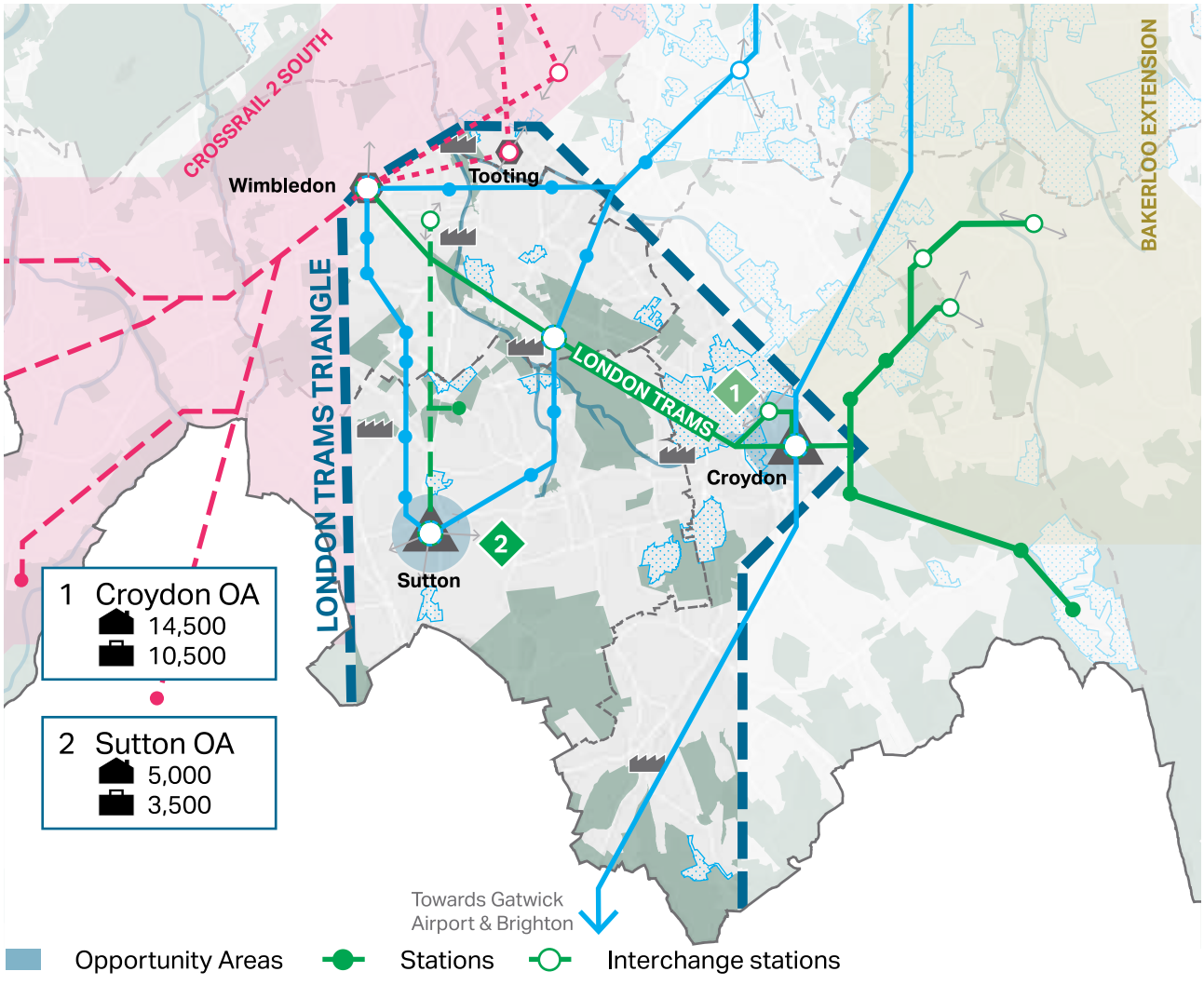
12 Isle of Dogs OA
- 29,000
- 110,000

Trams Triangle/London-Gatwick-Brighton mainline

2.1.68 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.

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

Figure 2.12 - Tram Triangle



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 consistent technical evidence.

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 9.6.7); factors that influence economic prosperity; the need to tackle climate change (including water management and flood risk); improvements to the environment (including air quality) and waste management (including 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. Though it is significantly larger than other centres in the Wider South East, it 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). 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[7], 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 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 such mutual benefits.

2.2.6 This structure 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').

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[8] states that 'cooperation between the Mayor, boroughs

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

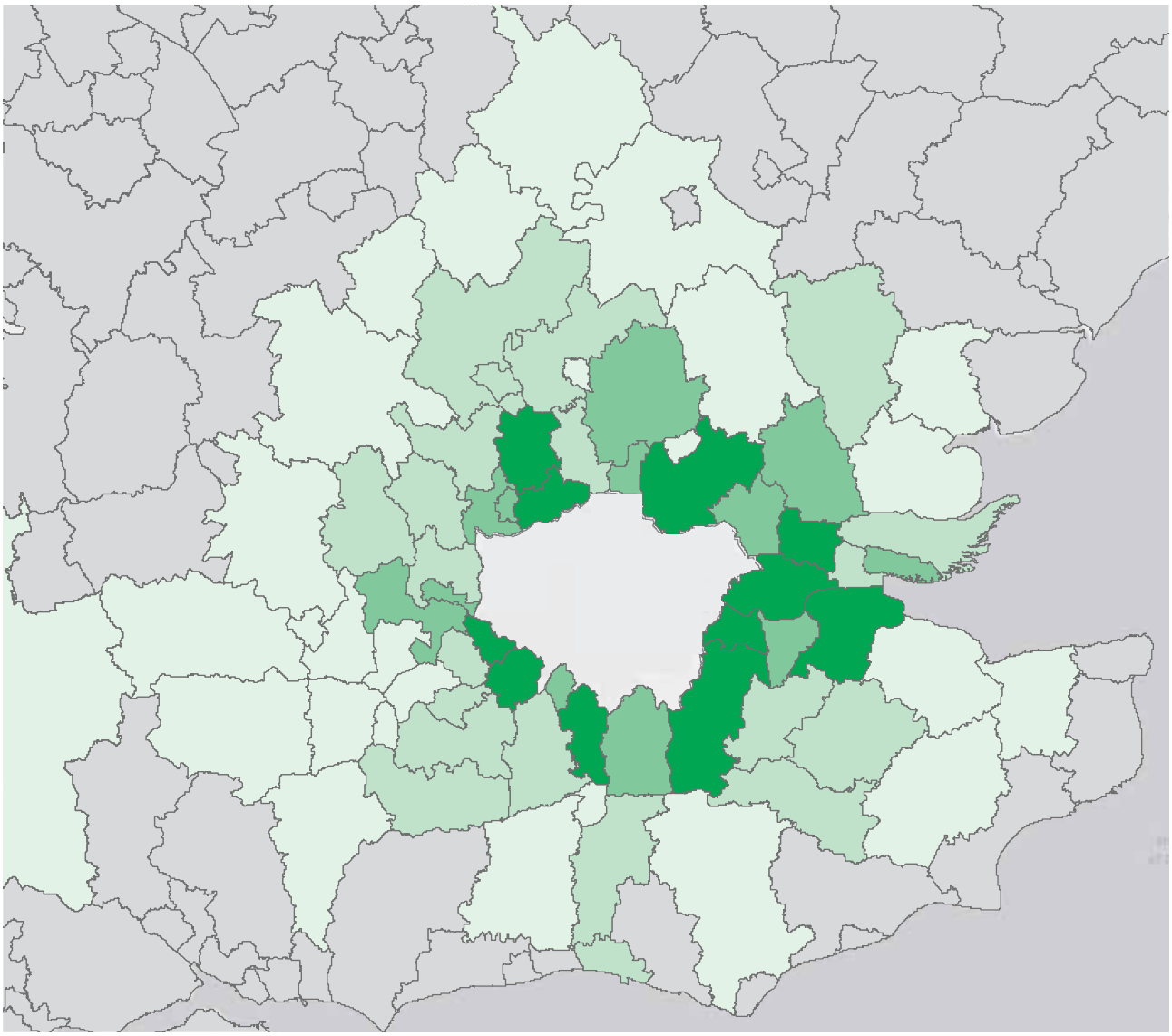
8 NPPG – Paragraph: 007 Reference ID: 9-007-20140306

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'.

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 may 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.

Figure 2.13 - Spatial Distribution of Commuting to London



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

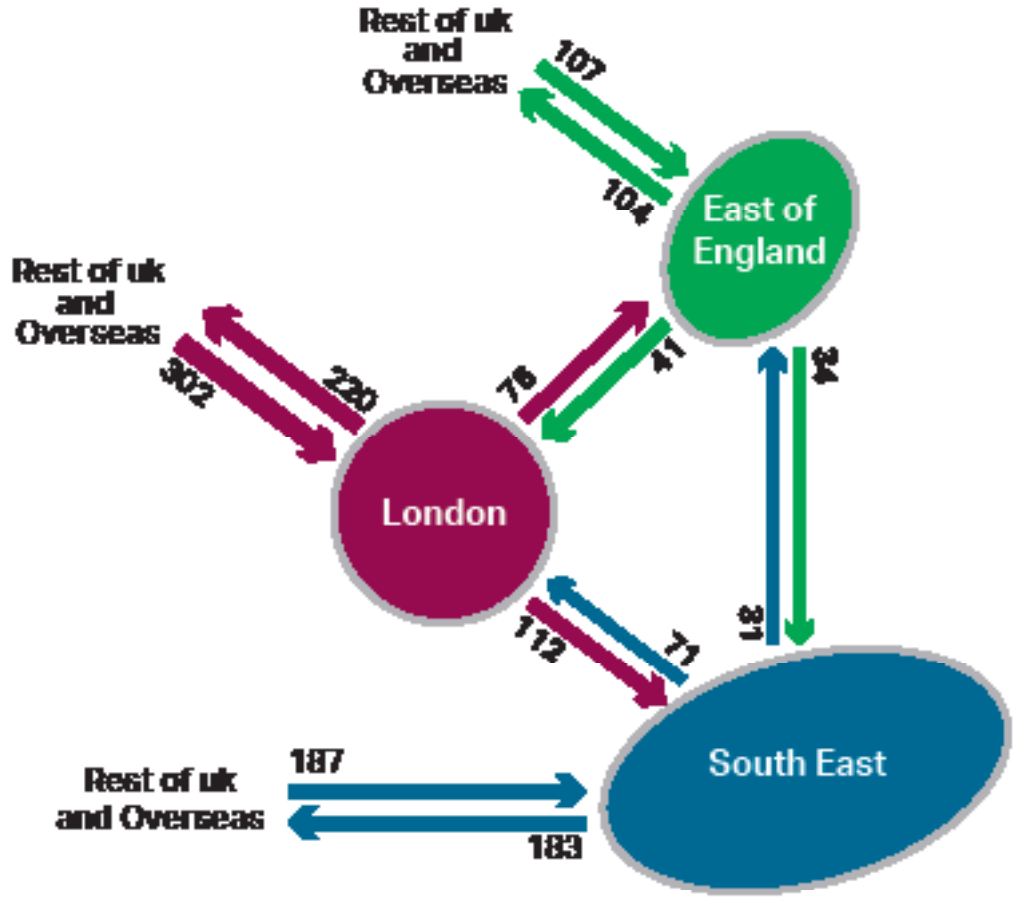
- Less than 2,700
- 2,700 - 6,100
- 6,100 - 10,300
- 10,300 - 15,900
- Greater than 15,900

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 relevant WSE partners, Government and other agencies to realise the potential of the wider city region and beyond through investment in strategic infrastructure to support housing and business development 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.

2.3.1 This Plan aims to accommodate all 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 Strategic Housing Land Availability Assessment suggests that London has the capacity for around 65,000 additional homes a year and the housing targets in this Plan reflect this.

2.3.4 Despite this Plan seeking to accommodate the vast majority of London's future growth, some migration will continue. 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 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. 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[9]. The Mayor could help to investigate and secure mutually beneficial infrastructure funding to unlock these opportunities.

2.3.6 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

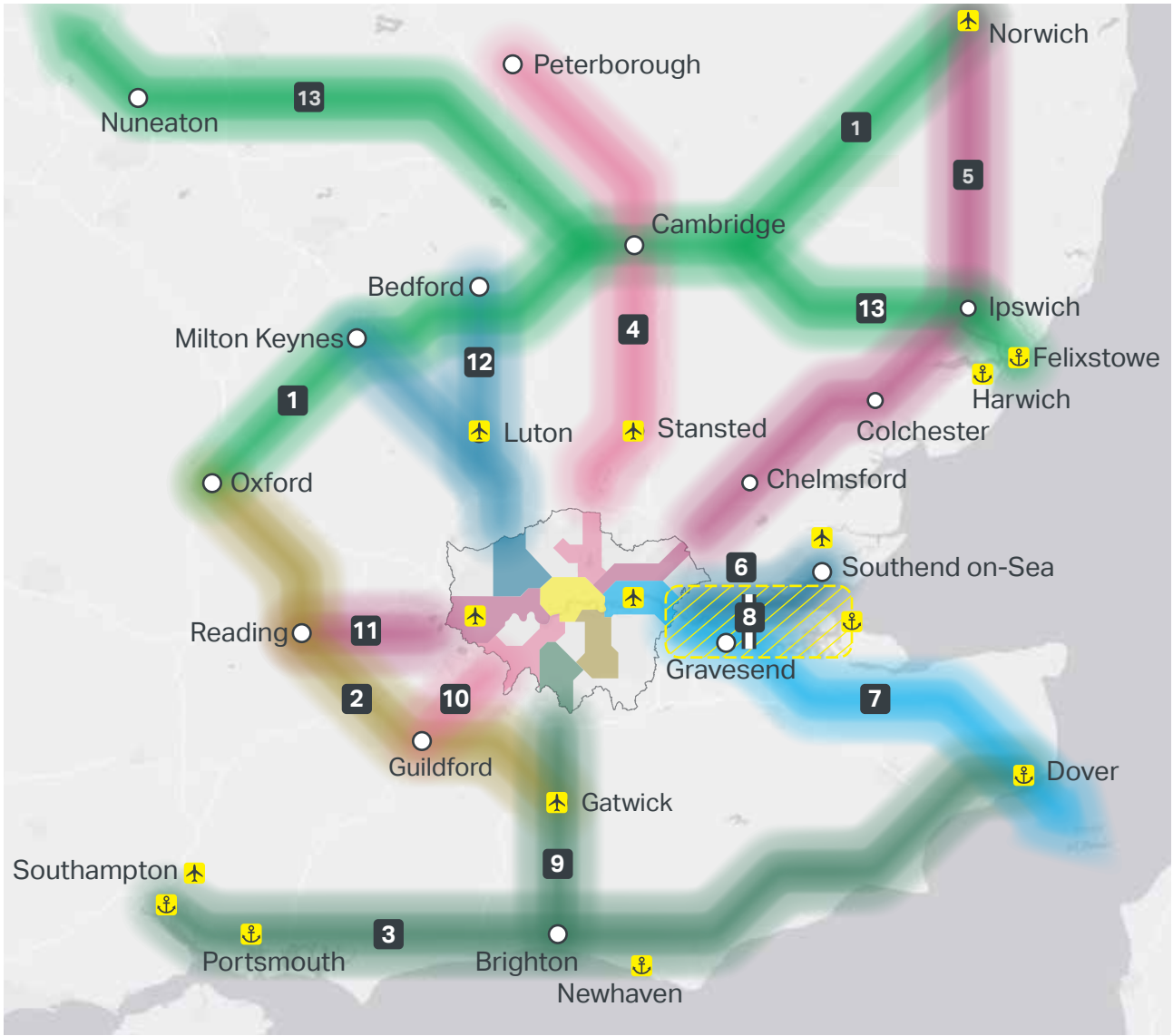
9 Locally-led Garden Villages, Towns and Cities (DCLG, March 2016)

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. Some of these orbital priorities may have more capacity to accommodate additional growth than the radial ones.

2.3.7 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 key **willing partners**, including local authorities, Local Enterprise Partnerships, 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.

2.3.8 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 support for example Memoranda of Understanding 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.

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 as well as 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 SI1 Improving air quality) and to address issues related to climate change and the urban heat island effect.

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

F The vitality and viability of the international shopping and leisure destinations of the West End and Knightsbridge together with other CAZ retail clusters 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 of the CAZ to residents, visitors and businesses should be enhanced 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 attractions of predominantly residential neighbourhoods, where more local uses predominate, should be conserved.

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 boundary of the CAZ 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
3) define the detailed boundaries of the CAZ satellite and reserve locations.

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'[10] location for world city office functions.

10 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.

Future potential reserve[11] 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
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 Alongside the range of strategic functions, the CAZ also contains housing, social infrastructure and community uses to address the needs of

[11] These locations 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.

residents, visitors and workers. Whilst they are not strategic functions of the CAZ, these **locally orientated uses** also 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.

2.4.6 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[12], 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 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[13].

2.4.7 The distinct **environment and heritage** of the CAZ should be sustained and enhanced through development decisions, Local Plans and other initiatives[14] such as the transformation of Oxford Street. 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.

2.4.8 **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[15].

2.4.9 **Arts, culture, tourism and entertainment activities** are a defining feature of the vibrant and distinctive character of the CAZ with its varied

12 Ramidus Consulting. 2017 London Office Policy Review. GLA, 2017

13 Ramidus Consulting, Small Offices and Mixed Use Development in CAZ, GLA 2015

14 Mayor's Environment Strategy 2017

15 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 2017.

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.

2.4.10 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 function which perform different roles in the wider London Plan town centre network (see Town Centre policies) 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 and niche retailing

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.

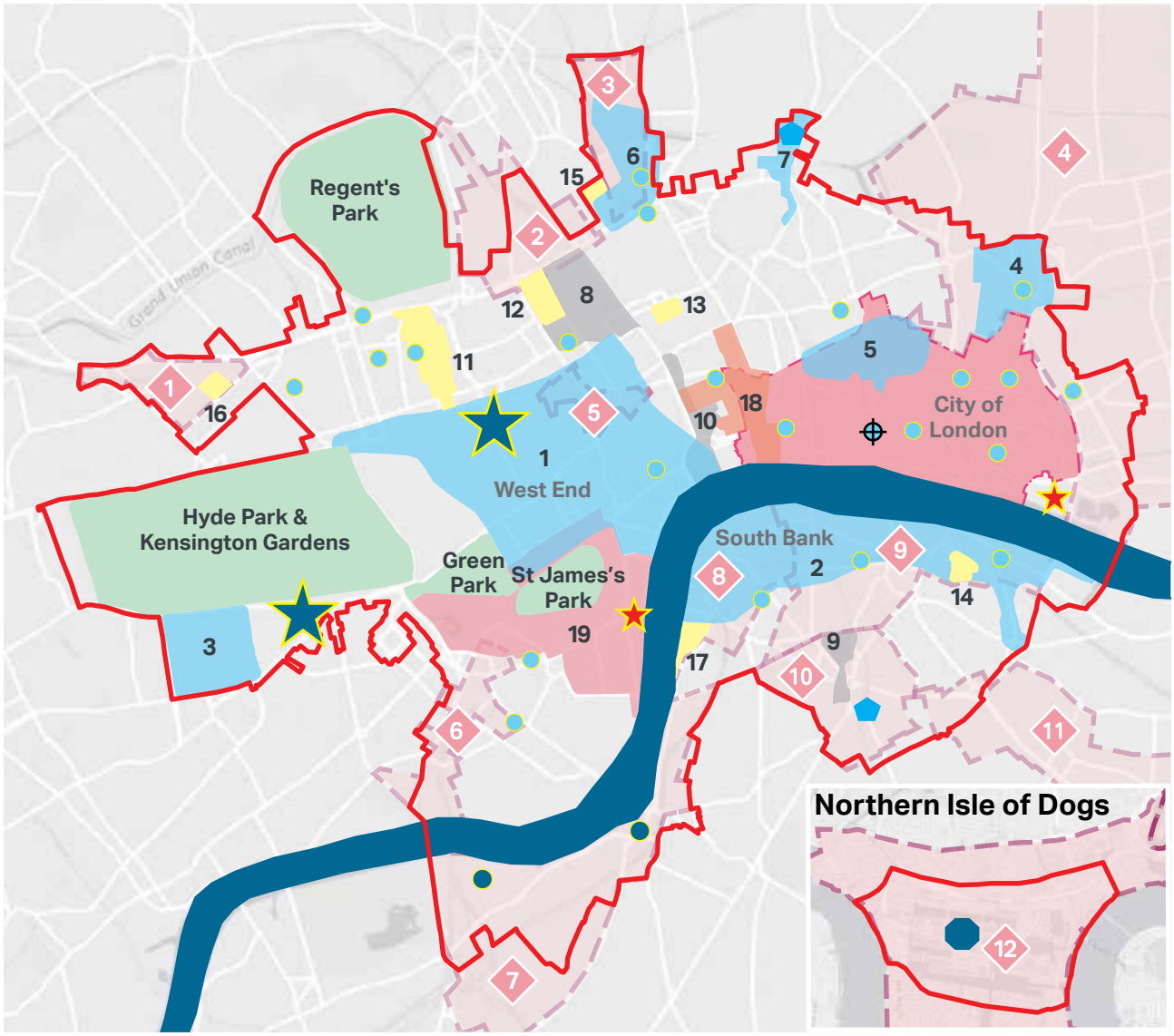
2.4.11 Wider trends in consumer expenditure and the emergence of **multi-channel retailing** present both challenges and opportunities for retailing within the CAZ. Overall, the CAZ is projected to have demand for approximately 375,000 sq m of additional comparison goods retail floorspace over the period 2016-2041[16] (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 along with improvements to the quality of the environment and public realm.

2.4.12 The CAZ contains several other important **specialist clusters of activity** which contribute towards the capital's international and national roles. These clusters include functions of state, health, law and education and are represented spatially in the CAZ Diagram (Figure 2.16). Many of these clusters have developed organically over 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 at Whitechapel and White City).

2.4.13 **Special Policy Areas** may be defined locally in specific and exceptional circumstances 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. They should only be defined in the above exceptional circumstances to avoid stifling innovation and change that is one of the defining features of the CAZ.

16 Experian. Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, GLA, 2017

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
- River Thames
- Opportunity Area

Specialist Clusters

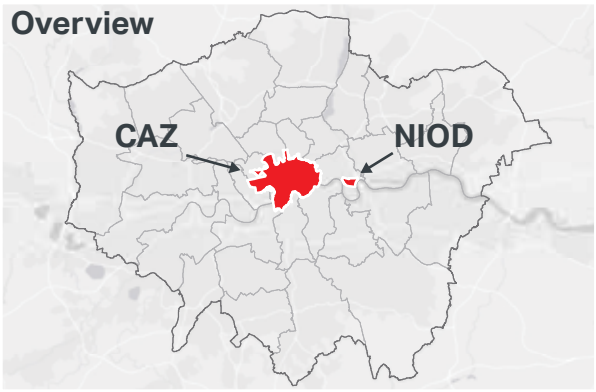
- Academic
- Arts, culture and entertainment
- Health
- Legal
- State

Source: GLA Planning

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Town Centres

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



Specialist Clusters

1. West End
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 - St Pancreas
4. City Fringe / Tech City
5. Tottenham Court Road
6. Victoria
7. Vauxhall, Nine Elms and Battersea
8. Waterloo
9. London Bridge, Borough and Bankside
10. Elephant and Castle
11. Old Kent Road
12. Isle of Dogs

2.4.14 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.

2.4.15 **Digital connectivity** and associated infrastructure is a key consideration in the CAZ where densities of commercial development in particular are high. Where necessary, applicants 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 SI6 Digital connectivity infrastructure).

2.4.16 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 **surface water flooding** due to low-lying land and the high proportion of impermeable surfaces.

2.4.17 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.

2.4.18 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 puts 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

17 AECOM et al. London Industrial Land Supply and Economy Study. GLA, 2016. CAG Consulting. London Industrial Land Demand Study, GLA, 2017

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 Policies 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 the commercial core of the City of London and Northern Isle of Dogs (detailed boundaries to be defined by boroughs in Development Plans).

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

1) other parts of the City of London and Northern Isle of Dogs (outside core areas in part B above)
2) the West End, Knightsbridge and other core commercial areas in the City of Westminster including Soho, Covent Garden, its Opportunity Areas and commercial parts of Marylebone and Fitzrovia
3) commercial core areas identified in the City Fringe/Tech City Opportunity Area Planning Framework
4) all other Opportunity Areas (except Vauxhall, Nine Elms, Battersea and Elephant & Castle)
5) identified clusters of specialist CAZ strategic functions, CAZ retail clusters and locally identified Special Policy Areas.

D Offices and other CAZ strategic functions are given equal weight relative to new residential in other parts of the CAZ not covered in parts B or C above including:

1) Vauxhall, Nine Elms, Battersea Opportunity Area
2) Elephant & Castle Opportunity Area

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

E In Development Plans, boroughs should develop local policies and define detailed boundaries for the areas in parts B, C and D above.

F 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).

G Mixed-use office/residential proposals are supported in principle in areas defined in parts C and D above where there is an equivalent or net increase in office floorspace.

H Residential development proposals should not lead to a loss of office floorspace in any part the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices and/or alternative provision is made for the provision of net additional office space near the development (including through swaps and credits – see part I below).

I Local approaches to mixed-use development of offices with housing should take into account the potential to use land use swaps, credits and off-site contributions to sustain strategically-important clusters of commercial activities such as those in the City of London, other parts of the commercial core of the CAZ and the Northern Isle of Dogs.

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 sq m (GIA) of office floorspace over the period 2016- 2041[18], an average of 140,000 sq m per annum. The **provision of a range of office floorspace** in 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

18 Ramidus Consulting, London Office Policy Review 2017, GLA

provides relatively affordable lower-cost market provision of business space (see Policy E2 Low-cost business space and Policy E3 Affordable workspace).

2.5.3 The agglomerations of offices and other CAZ strategic functions should not be compromised by new **residential development**. In particular, residential development is considered inappropriate in the commercial core areas 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 Offices and other CAZ strategic functions are given greater weight relative to new residential development in the **West End** and other core commercial areas of the CAZ reflecting the importance attached to CAZ strategic functions in these locations.

2.5.5 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.

2.5.6 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.

2.5.7 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.

2.5.8 **Land use swaps, credits and off-site contributions** 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 I by a specified residential or mixed residential and commercial development. The planning applications for the two sites are considered at the same time

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

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 I by a specified residential or mixed residential and commercial development.

2.5.9 **Affordable housing** provision should be provided on-site as part of residential and mixed-use schemes in the CAZ (see Policy H5 Delivering affordable housing). In exceptional circumstances, off-site and cash in lieu contributions can be provided in line with Policy H5 where this serves to sustain important clusters of commercial activities in the CAZ and Northern Isle of Dogs.

Policy SD6 Town centres

A London's varied town centres and their vitality and viability should be promoted and enhanced as:

1) strong, resilient, accessible, inclusive and viable hubs for a diverse range of uses including employment, business space, shopping, culture, leisure, night-time economy, tourism, civic, community, social infrastructure and residential development
2) locations for mixed-use or housing-led intensification and higher-density renewal, securing a high-quality environment and complementing local character and heritage assets
3) the structure for delivering sustainable access by walking, cycling and public transport to a competitive range of services and activities
4) the main focus for Londoners' sense of place and local identity in the capital
5) the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy
6) a key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management.

B The adaptation and restructuring 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 higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of 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.

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

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 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 7.7 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 provision of social infrastructure should be enhanced, and facilities should be located in places that maximise footfall to surrounding town centre uses.

J 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. 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.

2.6.2 Town centres have over the years absorbed change and new technologies. To continue to thrive they will need to evolve and diversify in response to current 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 or mixed-use high-density development. 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.

2.6.3 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[20]. Approximately 76 per cent of the gross comparison goods retail

20 Experian. Consumer Expenditure and Comparison Goods Retail Floorspace Need in London, GLA, 2017

floorspace requirement is anticipated to be focused in the International, Metropolitan and Major town centres and CAZ frontages, with 11 per cent in District centres[21]. As many as 60 per cent of District centres in London are likely to have surplus comparison goods retail space over the Plan period.

2.6.4 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.

Policy SD7 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 SD8 Town centres: development principles and Development Plan Documents). Centres with current or projected declining demand for commercial, particularly retail, floorspace may be reclassified at a lower level in the hierarchy.

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 and Neighbourhood centres can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks

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

and subject to assessments of retail impact where appropriate (see Policy SD8 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.

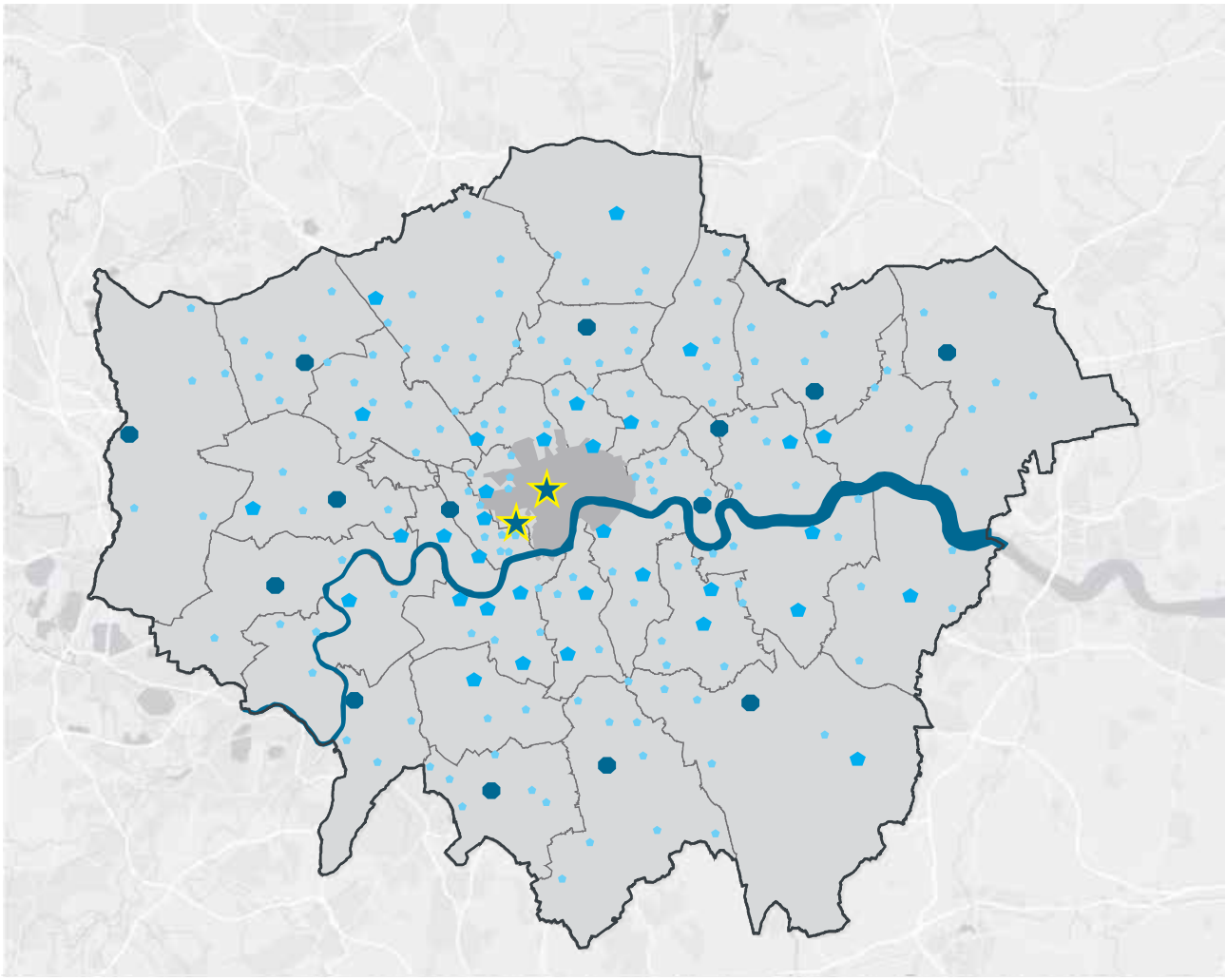
E District centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, local employment and workspace, whilst addressing the challenges of new forms of retailing and securing opportunities to realise their potential for higher density mixed-use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



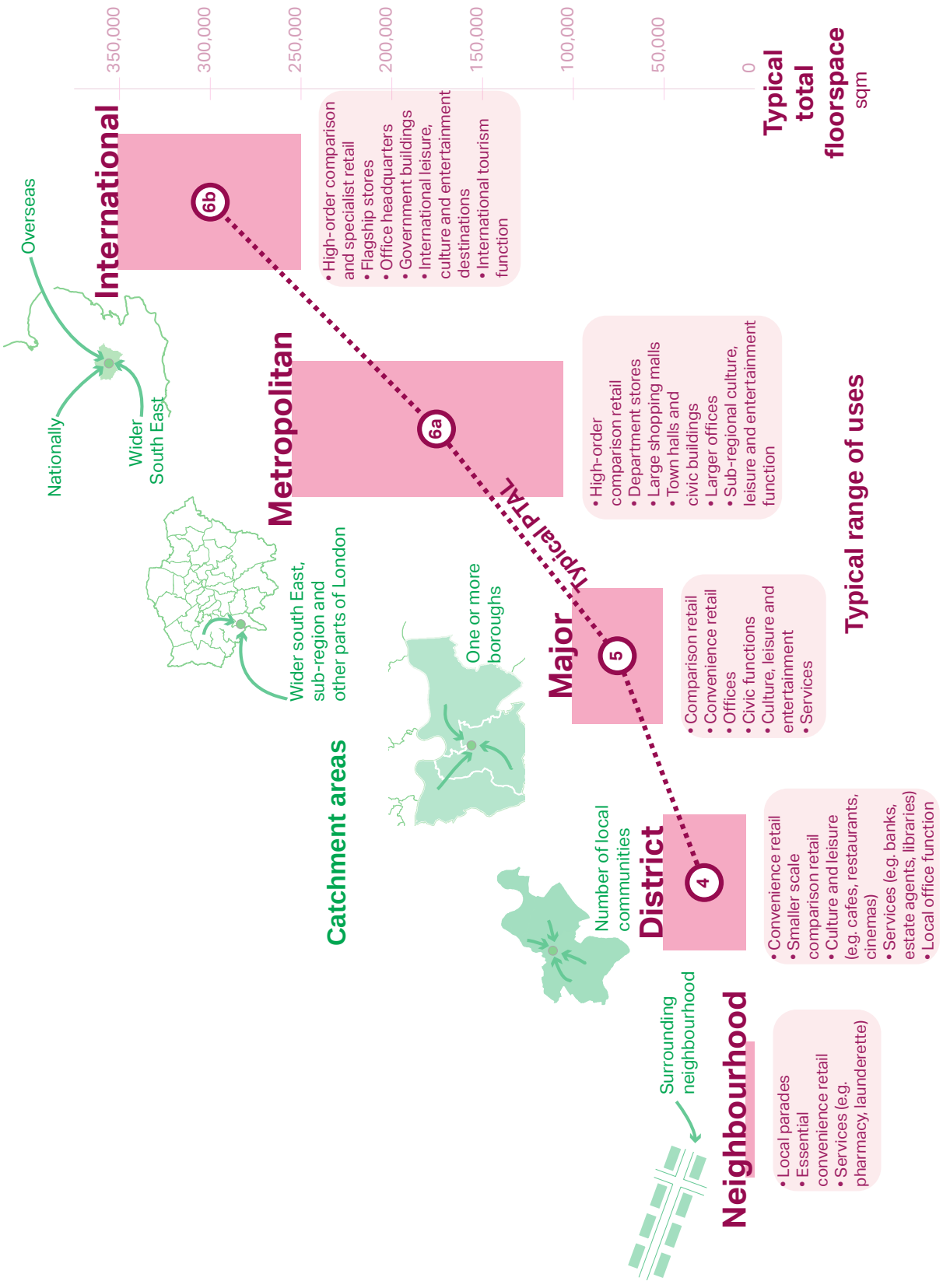
Town Centre Network

- International
- Metropolitan
- Major
- District
- CAZ

Source: GLA Planning

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Figure 2.18 - Town centre classifications



2.7.1 **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 2.4 shows typical characteristics of town centres within each classification.

2.7.2 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.

2.7.3 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.

2.7.4 These centres 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 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 SD8 Town centres: development principles and Development Plan Documents

A Development Plans and development proposals should take a town centres first approach by:

1) adopting a sequential approach to accommodating town centre uses including retail, commercial, offices, leisure, entertainment, culture, tourism and hotels such that new development of these uses is focused on sites within town centres or (if no sites are available, suitable or viable) on sites on the edges of centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport
2) firmly resisting out-of-centre development of town centre uses in line with the sequential approach in A(1) above, with limited exceptions for existing viable office locations in outer London (see Policy E1 Offices)
3) providing an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for town centre uses in part A(1) above that are not in accordance with the Development Plan
4) realising 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 having regard to parts A(1), (2) and (3) above.

B 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) 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 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 SD7 Town centre network)

3) develop policies for the edge and fringes of town centres, revising the extent of shopping frontages where surplus to forecast demand and introducing greater flexibility, permitting a range of non-residential uses particularly in secondary frontages taking into account local circumstances

4) 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) existing and potential level of density of development and activity

    f) relationship with wider regeneration initiatives

    g) vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre

    h) potential to complement local character, existing heritage assets and improve the quality of the town centre environment

    i) viability of development.

5) 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

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

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

C 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 above, fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing, and marketed at rental levels that are related to demand in the area or similar to surrounding existing properties

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.

2.8.1 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.

2.8.2 Where **edge-of-centre developments of town centre** 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 retail, leisure and office development greater than 2,500 sq m. 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.

2.8.3 Existing out-of-centre and edge-of-centre retail and leisure parks are often low density and car dependent, 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.

2.8.4 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. Out-of-centre housing-led developments should seek to maximise the provision of housing and create active frontages and welcoming streetscapes through the provision of ground floor windows, front doors and front gardens where appropriate. 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 SD9 Town centres: Local partnerships and implementation

A To develop strong, resilient and adaptable town centres, fulfilling their full potential to accommodate growth and development, strategic and local partnership approaches, community engagement, town centre management, business associations and Business Improvement Districts should be supported and encouraged. Each town centre should have a Town Centre Strategy produced in partnership at the local level in a way that is inclusive and representative of the local community.

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

C 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. It is therefore crucial that a **strategy is developed for each town centre**, 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**, with a clear vision developed with the local community, taking account of the town centre's strategic role, opportunities for growth, and potential to support regeneration. 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 benefits of high streets and town centres, especially the formal and informal networks that support local communities, and should 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[22] 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 Boroughs should:

1) identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans 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.

22 London Town Centre Health Check, GLA 2017

B Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling spatial 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.

C 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 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 spatial inequalities.

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 and individuals, to develop a shared vision for the area. Successful regeneration requires

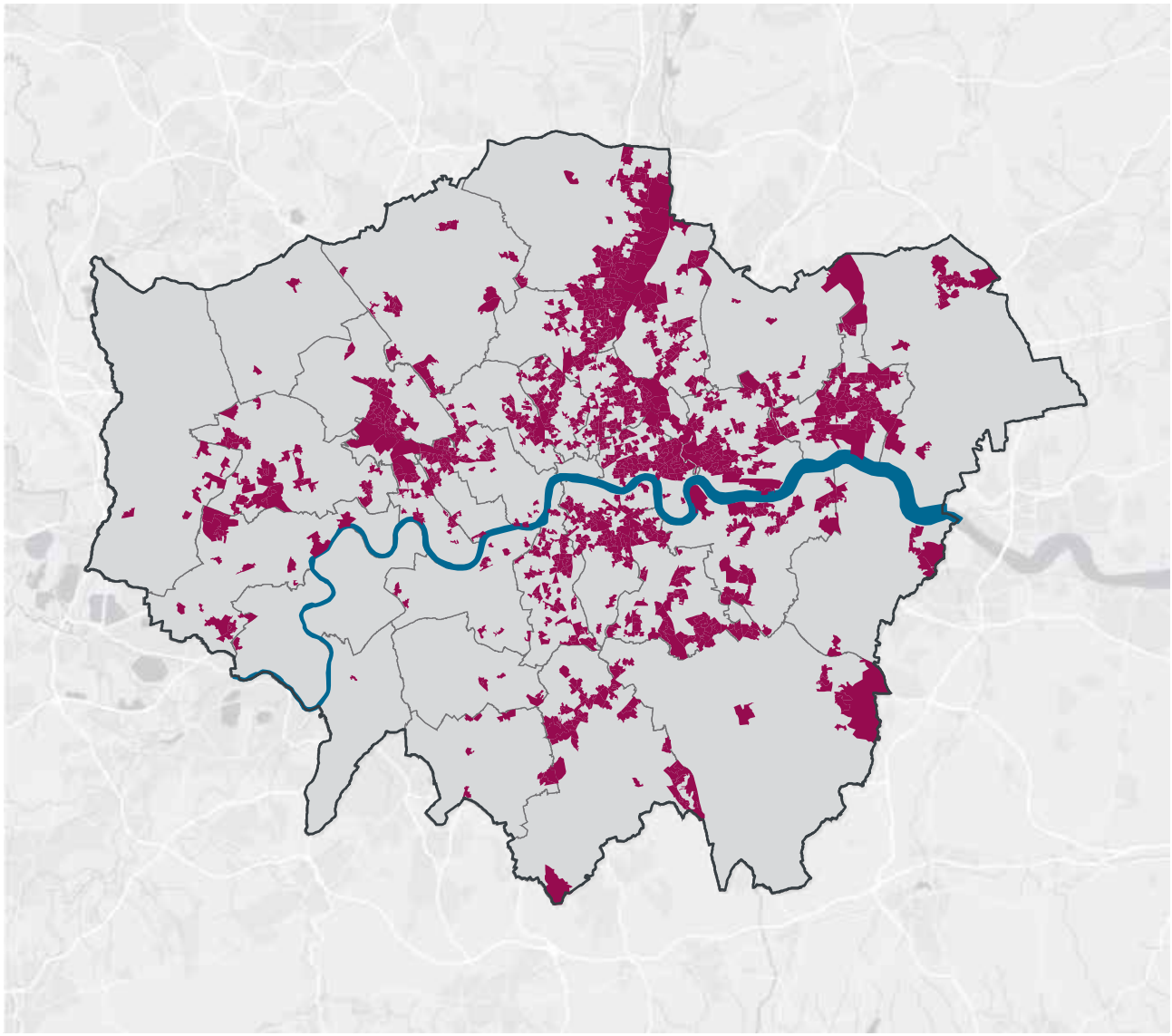
all stakeholders to operate in a collaborative way, pooling resources and creating partnerships. There should be a shared understanding of how the regeneration area needs to change, and how that change will be secured, managed, embedded within and supported by the community. By taking an integrated, spatial approach to a wide range of issues, Development Plans and Opportunity Area Planning Frameworks have a key role to play in tackling spatial inequalities and the causes of deprivation.

2.10.4 In identifying Local Areas for Regeneration, boroughs should use their local knowledge and that of their communities to **identify and understand the particular needs of the area**. The individual measures of deprivation that make up the IMD should be used to identify specific areas that are affected by particular issues, and regeneration strategies, investment and the approach taken in Local Plans should be tailored to reflect these. Local Plans should also look closely at the Strategic Areas for Regeneration and 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**, including cultural venues, heritage assets, community facilities and social infrastructure, as well as creating new spaces for people to enjoy.

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

Source: GLA Planning and DCLG
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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



Policy D1 London's form and characteristics

Development Plans, area-based strategies and development proposals should address the following:

A The form and layout of a place should:

1) use land efficiently by optimising density, connectivity and land use patterns
2) facilitate an inclusive environment
3) be street-based with clearly defined public and private environments
4) deliver appropriate outlook, privacy and amenity
5) achieve safe and secure 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) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
8) 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
9) help prevent or mitigate the impacts of noise and poor air quality
10) 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.

B Development design should:

1) respond to local context by delivering buildings and spaces that are positioned and of a scale, appearance and shape that responds successfully to the identity and character of the locality, including to existing and emerging street hierarchy, building types, forms and proportions
2) 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

3) aim for high sustainability standards
4) respect, enhance and utilise the heritage assets and architectural features that make up the local character
5) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water
6) achieve comfortable and inviting environments both inside and outside buildings.

3.1.1 **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, 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 (see also Policy D6 Optimising housing density).

3.1.2 Developments that show a clear understanding of, and relationship with, **the context of the site** are more likely to be successful. 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.

3.1.3 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 minimise carbon emissions by reducing energy demand.

3.1.4 **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.

3.1.5 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.

3.1.6 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.

3.1.7 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.

3.1.8 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.

3.1.9 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.

3.1.10 To minimise the use of new materials, the following circular economy principles (see also Figure 3.1) should be taken into account at the start of the design process:

- 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

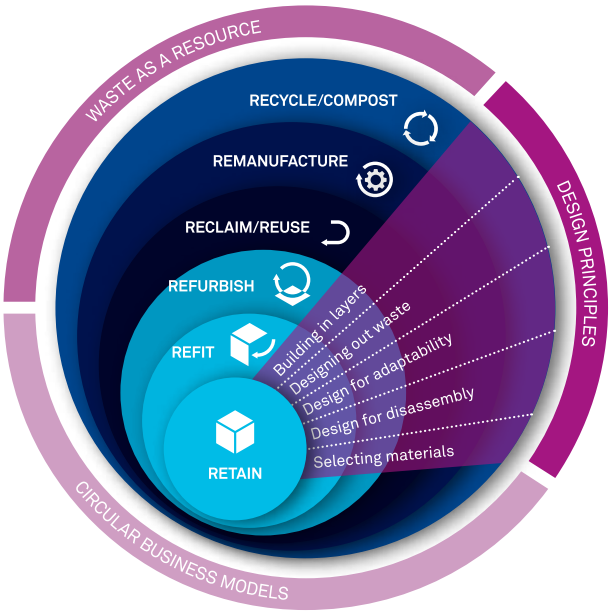
from project inception to completion, including consideration of standardised components, modular build and re-use of secondary products and materials

- designing for adaptability
- designing for disassembly
- using materials that can be re-used and recycled.

3.1.11 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 is provided in **London's circular economy route map**[23].

3.1.12 Figure 3.1 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.

Figure 3.1 - Circular economy hierarchy for building approaches



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

23 London's circular economy route map, GLA & London Waste and Recycling Board. 2017

Policy D2 Delivering good design

Initial evaluation

A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area-based strategies, which covers the following elements:

1) socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)
2) housing type and tenure
3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)
4) transport networks (particularly walking and cycling networks), and public transport connectivity (existing and planned)
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) existing and future uses and demand for new development, including housing requirements and social infrastructure.

Determining capacity for growth

B The findings of the above evaluation (part A), taken together with the other policies in this Plan should inform sustainable options for growth and be used to establish the most appropriate form of development for an area in terms of scale, height, density, layout and land uses. The outcome of this process must ensure the most efficient use of land is made so that development on all sites is optimised.

Design analysis and visualisation

C 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 and engage Londoners in the planning process.

Design quality and development certainty

D 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 characteristic set out in Policy D1 London's form and characteristics.

Design scrutiny

E Design and access statements submitted with development proposals should provide relevant information to demonstrate the proposal meets the design requirements of the London Plan.

F Boroughs and applicants should use design review to assess and inform design options early in the planning process. Design review should be in addition to the borough's planning and urban design officers' assessment and pre-application advice. 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, if they:

1) are above the applicable density indicated in Part C of Policy D6 Optimising housing density; or
2) propose a building defined as a tall building by the borough (see Policy D8 Tall buildings), or that is more than 30m in height where there is no local tall building definition.

G 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 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 been addressed.

Maintaining design quality

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

1) having a sufficient level of design information, including key construction details provided as part of the application to ensure the quality of design can be maintained if the permitted scheme is subject to subsequent minor amendments
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 using architect retention clauses in legal agreements where appropriate.

3.2.1 The processes and actions set out in Policy D2 Delivering good design 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.

3.2.2 **Understanding the existing character and context** of individual areas is essential in determining how different places may 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.

3.2.3 This **evidence gathering and evaluation** of alternative options, alongside an understanding of the requirements for growth, should form the foundation of Local Plan preparation or work on an area strategy. 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.

3.2.4 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.

3.2.5 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.

3.2.6 The **Mayor's Design Advocates** 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.

3.2.7 The Mayor has produced **guidance on design reviews**, including how panels and processes should be managed. All development proposals should follow this guidance, and be subject to a level of scrutiny appropriate to the scale of the site. This design scrutiny should include work by planning case officers and ongoing and informal review by qualified urban design officers as well as formal design review.

3.2.8 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 and be used to consider if a scheme meets the requirements of Policy D1 London's form and characteristics (see also requirements of Policy D3 Inclusive design).

3.2.9 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 often allowable as minor amendments. 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 visuals 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. 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.

3.2.10 It is generally beneficial to the design quality of a completed development if the architectural design team is involved in the development from start to finish[24]. Consideration should be given to **securing the design team's ongoing involvement** as a condition of planning permission, or as a design reviewer where this is not possible.

Policy D3 Inclusive design

A To deliver an inclusive environment and meet the needs of all Londoners, development proposals are required to achieve the highest standards of accessible and inclusive design, ensuring they:

1) can be entered and used safely, easily and with dignity by all
2) are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment
3) are designed to incorporate safe and dignified emergency evacuation for all building users. In developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity

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

assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building.

B The Design and Access Statement, submitted as part of planning applications, should include an inclusive design statement.

3.3.1 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 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, regardless of their age, disability, ethnicity, gender, gender expression, faith, economic circumstance or whether they are travelling with children, or are carrying shopping or luggage. Inclusive design is fundamental to improving the quality of life for disabled and older people in particular.

3.3.2 Inclusive design creates spaces and places where people can lead more interconnected lives, **creating more inclusive communities**. Links to the wider neighbourhood for all pedestrians should be carefully considered, including networks of navigable safe pedestrian routes, dropped kerbs and crossing points with associated tactile paving. Links into the neighbourhood for all pedestrians should be carefully considered, including networks of navigable safe pedestrian routes, dropped kerbs and crossing points with associated tactile paving.

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

3.3.4 **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.

3.3.5 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 devices 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. Elements of construction forming refuges, evacuation lift enclosures and lobbies should incorporate suitable levels of fire resistance.

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

3.3.7 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, 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
- show that the potential impacts of the proposal on people and communities who share a protected characteristic have been identified and assessed
- highlight any historical contextual considerations
- set out how inclusion will be maintained and managed, including fire evacuation procedures
- detail how relevant best practice standards and design guidance have been applied, and how relevant planning policy and legal requirements (including, where relevant, the Public Sector Equality Duty of the Equality Act 2010) have been responded to
- detail engagement with relevant user groups such as disabled or older people's organisations.

3.3.8 The Mayor will assist boroughs and other agencies in implementing an inclusive design approach in all development proposals 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 British Standards BS8300 Volumes 1 and 2.

Policy D4 Housing quality and standards

A To optimise the development of housing on sites across London a range of housing typologies will need to be built. To bring forward development on constrained sites, innovative housing designs that meet the requirements of this policy, including minimum space standards, are supported. In ensuring high quality design, housing developments should consider the elements that enable the home to become a comfortable place of retreat and should not differentiate between housing tenures.

B New homes should have adequately-sized rooms and convenient and efficient room layouts which are functional, fit for purpose and meet the changing needs of Londoners over their lifetimes. Particular account should be taken of the needs of children, disabled and older people.

C Qualitative aspects of a development are key to ensuring successful sustainable housing and should be fully considered in the design of any housing developments.

D Housing developments are required to meet the minimum standards below. These standards 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 sqm 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 sqm.
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 sqm 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 sqm in a double bedroom and 0.36 sqm 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) A minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. This does not count towards the minimum Gross Internal Area space standards required in Table 3.1.

10) The minimum depth and width for all balconies and other private external spaces should be 1.5m.

E Residential 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 Policy D1 London's form and characteristics than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

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

G Dwellings 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.

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

Table 3.1 - Minimum space standards for new dwellings[25]

		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) *			1
	2p	50	58		1.5
2b	3p	61	70		2
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4
	8p	125	132	138	

Notes to Table 3.1
b: bedrooms
p: persons
* Where a studio / one bedroom one person one bedspace (i.e. one single bedroom) dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39 sqm to 37 sqm, as shown bracketed.
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 (sqm).
Built-in storage areas are included within the overall GIA and include an allowance of 0.5 sqm for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger.

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

3.4.1 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 D4 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 sqm per extra bedspace.

3.4.2 The space standards are minimums which applicants are encouraged to exceed. However, due to the level of housing need and the requirement to make the best use of land, boroughs are encouraged to resist dwellings with floor areas significantly above those set out in Table 3.1 as they do not constitute an **efficient use of land**. The standards apply to all new self-contained dwellings of any tenure. 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.

3.4.3 To address the impacts of the urban heat island effect and the fact that the majority of residential developments in London are 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.

3.4.4 **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, mitigating pollution, 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.

3.4.5 **Single aspect dwellings** are more difficult to ventilate naturally and are more likely to overheat, and 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 not be permitted. 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.

3.4.6 **Private open 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 amenity or garden space is encouraged.

3.4.7 **Communal play space** for children and young people should be provided in developments with an estimated occupancy of ten children or more in accordance with the requirement of Policy S4 Play and informal recreation.

3.4.8 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.

3.4.9 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.

3.4.10 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.

3.4.11 The following **qualitative aspects** should be addressed in the design of residential developments:

- the built form, massing and height of the development is appropriate for the surrounding context, and 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 D6.E), particularly where a proposal is above the applicable density indicated in part C of Policy D6 Optimising housing density

- the urban layout, including spaces between and around buildings forms a coherent pattern of streets and blocks
- public, communal and private open spaces relate well to each other and the wider neighbourhood
- the layout of the scheme maximises the extent of active frontages onto public facing sides and, where appropriate, surrounds uses that have inactive frontages with uses that have active frontages to engender street-based activity and provide a sense of safety
- the experience of arrival, via footpaths, entrances and shared circulation spaces is comfortable, accessible and fit for purpose
- communal open spaces provide sufficient space, are easily accessed from all related dwellings and are designed to support an appropriate balance of informal social activity and play opportunities for various age groups
- the private amenity space for each dwelling is usable and has a balance of openness and protection, appropriate for its outlook and orientation
- outdoor spaces are located to be appreciated from inside, and internal spaces are able to take advantage of good weather and designed to achieve ease of access to external spaces
- blocks and floorplans are 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
- the dwellings and outside spaces are fit for purpose and comfortable
- the dwellings and outside spaces are able to be easily adapted to meet the changing and diverse needs of different occupiers over their lifetimes
- window cleaning and other basic cleaning and maintenance activities can be carried out by residents easily
- the site layout, common parts, design of individual units and buildings, and orientation of rooms and windows provide privacy and adequate daylight for all residents, as well as clear and convenient routes with a feeling of safety

- the design or the layout and orientation helps reduce noise from common areas to individual dwellings
- the design of developments, and orientation and layout of individual dwellings and common spaces helps meet the challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters
- sufficient level, secure and convenient externally accessible storage is provided for cycles, deliveries, and other bulky items
- recycling and waste disposal facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services[26].

3.4.12 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 D4 Housing quality and standards for all housing tenures, as well as wider qualitative aspects of housing developments. This will build on the guidance set out in the 2016 Housing SPG and the previous London Housing Design Guide.

Policy D5 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 new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users
2) all other new build dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

26 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/

3.5.1 Many households in London already require **accessible or adapted housing** to lead dignified and independent lives[27]. More 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 D5 Accessible housing should apply to all new build dwellings.

3.5.2 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.

3.5.3 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.

3.5.4 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[28] 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.

3.5.5 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.

3.5.6 In exceptional circumstances, the provision of a lift to dwelling entrances may not be achievable. In the following circumstances and 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, and stacked maisonettes where

27 Source – English Housing Survey

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

the potential for decked access to lifts is restricted

- Blocks where the implications of ongoing maintenance costs on the affordability of service charges for residents will be prohibitive.

3.5.7 If it is agreed at 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.

3.5.8 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 are required to meet M4(2)
- Number of dwellings per size typology (i.e. x no. of y bed units) which are required to meet M4(3) wheelchair accessible standards
- Number of dwellings per size typology (i.e. x no. of y bed units) which are required to meet M4(3) wheelchair adaptable standards

Policy D6 Optimising housing density

A Development proposals must make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to:

1) the site context
2) its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL)
3) the capacity of surrounding infrastructure.

Proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.

B The capacity of existing and planned physical, environmental and social infrastructure to support new development should be assessed and, where necessary, improvements to infrastructure capacity should be planned to support growth.

1) The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels.
2) The ability to support proposed densities through encouraging active travel should be taken into account.
3) 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, in exceptional circumstances, that development is contingent on the provision of the necessary infrastructure and public transport services and that the development is phased accordingly.

C The higher the density of a development, the greater the level of scrutiny that is required of its design, particularly the qualitative aspects of the development design described in Policy D4 Housing quality and standards, and the proposed ongoing management. Development proposals with a residential component that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design and submit a management plan if the proposed density is above:

1) 110 units per hectare in areas of PTAL 0 to 1; or
2) 240 units per hectare in areas of PTAL 2 to 3; or
3) 405 units per hectare in areas of PTAL 4 to 6.

D The following measures 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 or bedrooms per hectare
4) number of bedspaces per hectare.

E The following additional measures 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).

These built form and massing measures should be considered in relation to the surrounding context to help inform the optimum density of a development.

3.6.1 For London to accommodate growth in an inclusive and responsible way every new development needs to make the most efficient use of land. This will mean developing at densities above those of the surrounding area on most sites. The design of the development must **optimise housing density**. A design-led approach to optimising density should be based on an evaluation of the site's attributes, its surrounding context and capacity for growth and the most appropriate development form, which are determined by following the process set out in Policy D2 Delivering good design. Policy H1 Increasing housing supply, Policy H2 Small sites and Policy H3 Monitoring housing targets set out requirements for increasing housing supply across London and identify locations where increased housing capacity can be achieved.

3.6.2 **Infrastructure assessments** should be proportionate to the scale of the development. Minor developments will typically have only incremental impacts on local infrastructure capacity, which should be addressed by boroughs' Infrastructure Delivery Plans. 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.

3.6.3 The surrounding infrastructure of all types is a key element in determining the optimum density of a site. 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. Boroughs and infrastructure providers should also consider the cumulative impact of multiple development proposals in an area. 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.

3.6.4 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 exceptional circumstances for which part B3 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.

3.6.5 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.

3.6.6 **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.

3.6.7 The proposed design and management of the developments should be thoroughly scrutinised during the planning process in line with part C of Policy D6 Optimising housing density. 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 D4 Housing quality and standards help ensure that as densities increase, the quality of the internal residential units is maintained.

3.6.8 **Management plans** required to be submitted with higher density development proposal must include details of day-to-day servicing and

deliveries, and longer-term maintenance implications. Management plans should provide details on the affordability of running costs and service charges (by different types of occupiers). Costed plans should set out how management arrangements will work in mixed-tenure schemes and the way in which residents' views will be taken into account in delivering affordable services.

3.6.9 **Housing density** has been measured and monitored in London over recent years in units per hectare (u/ha). Average density across London of new housing approvals in the monitoring year 2015/16 was 154 u/ha with the highest average density being recorded in Tower Hamlets at 488 u/ha. However, 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.

3.6.10 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 (part D of Policy D6 Optimising housing density) will be relevant for infrastructure provision, while measures of density related to the built form and massing (part E of Policy D6 Optimising housing density) will inform its integration with the surrounding context. Measures relating to height 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.

Policy D7 Public realm

Development Plans and development proposals should:

A Ensure the public realm is safe, accessible, inclusive, attractive, well-connected, easy to understand and maintain, and that it relates to the local and historic context, and incorporates the highest quality design, landscaping, planting, street furniture and surfaces.

B 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.

C 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 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.

D 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.

E 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.

F 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.

G 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.

H Incorporate green infrastructure into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.

I Ensure that shade and shelter are provided with appropriate types and amounts of seating to encourage people to spend time in a place, where appropriate. This should be done in conjunction with the removal of any unnecessary or dysfunctional clutter or street furniture to ensure the function of the space and pedestrian amenity is improved. Applications which seek to introduce unnecessary street furniture should normally be refused.

J Explore opportunities for innovative approaches to improving the public realm such as open street events.

K Create an engaging public realm for people of all ages, with opportunities for formal and informal play and social activities 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.

L Ensure that 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. Pedestrian crossings should be regular, convenient and accessible.

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

3.7.1 The **public ream** 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 shopping malls, sky gardens, viewing platforms, museums or station concourses. Such forms of public realm are particularly relevant in areas of higher density.

3.7.2 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 multi-functional, attractive, accessible and contribute to the highest possible standards of comfort, good acoustic design, security and ease

of 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.

3.7.3 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, and accessing services and employment, such as high streets or public squares.

3.7.4 The specific balance between the different functions of any one space, such as its place-based activities and its function to facilitate movement, 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.

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

3.7.6 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 careful design and good acoustic design.

3.7.7 **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.

3.7.8 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.

3.7.9 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.

3.7.10 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.

3.7.11 The provision of **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 refill water bottles as well as 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 planning stage to ensure long-term provision is achievable.

3.7.12 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 D8 Tall buildings

Tall buildings have a role to play in helping London accommodate its expected growth as well as supporting legibility across the city to enable people to navigate to key destinations. To ensure tall buildings are sustainably developed in appropriate locations, and are of the required design quality, Development Plans and development proposals must undertake the following:

Definition

A Based on local context, Development Plans should define what is considered a tall building, the height of which may vary in different parts of London.

Tall building locations

B Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in Development Plans the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate, taking account of:

1) the visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below)
2) their potential contribution to new homes, economic growth and regeneration
3) the public transport connectivity of different locations.

Impacts

C The impacts of a tall building can be visual, functional or environmental. All three elements should be considered within plan-making and in deciding development proposals:

1) Visual impacts
    a) The views of buildings from different distances need to be considered, including:
        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 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 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 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 not contribute to a canyon effect along the river which encloses the open aspect of the river and the riverside public realm, or adversely affect strategic or local views along the river

g) Buildings should not cause adverse reflected glare.

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) Infrastructure improvements required as a result of the development should be delivered and phased appropriately

f) 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

g) 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 Publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings.

3.8.1 Whilst high density does not need to imply high rise, **tall buildings** can form part of a strategic approach to meeting regeneration and economic development goals, 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 main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality 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 in Policy D2 Delivering good design will enable boroughs to identify areas where tall buildings can play a positive role in shaping the character of an area.

3.8.2 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. In large areas of extensive change, such as Opportunity Areas, **definitions** of tall buildings should relate to the evolving context. For the purpose of assessing applications referable to the Mayor, a tall building is a development that meets one or more of the following descriptions:

- it falls within the Thames Policy Area and is more than 25m in height

- it falls anywhere else within the City of London and is more than 150m in height
- it is more than 30m in height elsewhere in London.

3.8.3 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.

3.8.4 A tall building can be considered as being 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 D7 Public realm. Well-designed safety measures should be integrated into the design of tall buildings and must ensure personal safety at height.

3.8.5 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.

3.8.6 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.

3.8.7 Any **external lighting** for tall buildings should be energy efficient, and designed to minimise glare, light trespass, and sky glow, and ensure it does not negatively impact on the amenity of nearby residents.

3.8.8 The list of impacts of tall buildings in Policy D8 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.

3.8.9 **Safety** considerations must be central to the design and operation of tall buildings. Policy D10 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 D11 Fire safety sets out specific requirements to address fire risk.

Policy D9 Basement development

A Boroughs, particularly in inner London, should establish policies to address the negative impacts of large-scale basement development beneath existing buildings.

3.9.1 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.

3.9.2 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. Where basement developments cause particular harm, boroughs can consider introducing **Article 4 Directions** to require smaller-scale proposals to obtain planning permission.

3.9.3 The Mayor considers that **smaller-scale basement excavations**, where they are appropriately designed and constructed, can contribute to the efficient use of land. They can provide an affordable option for families to provide extra living space without the costs of moving house, although these developments rarely result in the provision of additional residential units to help meet London's housing need.

3.9.4 The construction of basements can, however, 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.

3.9.5 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 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 there is a known risk of flooding, boroughs may consider restricting the use of basements for non-habitable uses. The Agent of Change Principle (Policy D12 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.

Policy D10 Safety, security and resilience to emergency

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.

A 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 and Emergency Planning Authority, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area and to support provision of necessary infrastructure to maintain a safe and secure environment.

B Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of 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.

3.10.1 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[29] meetings about incidents affecting, or potentially affecting, London. The London Resilience Partnership maintains the London Risk Register[30]. The **London Risk Register** provides a summary of the main risks affecting London and identifies the existing risk management arrangements for the risks.

3.10.2 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 and Emergency Planning Authority (LFEPA) 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.

3.10.3 Measures to **design out crime**, including counter terrorism measures, should be integral to development proposals and considered early in the

29 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.

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

design process[31]. This will ensure they 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.

3.10.4 New development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of detecting intrusion, and delay any attempts at disruption until a response can be activated. 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 respond to the potential level of risk whilst ensuring the quality of places is maximised.

Policy D11 Fire safety

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

1) are designed to incorporate appropriate features which reduce the risk to life in the event of a fire
2) are constructed in an appropriate way to minimise the risk of fire spread
3) provide suitable and convenient means of escape for all building users
4) adopt a robust strategy for evacuation which all building users can have confidence in

31 Crowded Places: 2017 National Counter-Terrorism Security Office https://www.gov.uk/government/publications/crowded-places-guidance ; Crowded places - the planning system and counter-terrorism: 2012, Home Office and DCLG; and Protecting crowded places: design and technical issues: 2014, Home Office, Centre for the Protection of National Infrastructure and the National Counter-Terrorism Security Office https://www.gov.uk/government/collections/crowded-places

5) 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
2) the means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated management plan approach
3) 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
4) how provision will be made within the site to enable fire appliances to gain access to the building.

3.11.1 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.

3.11.2 The subject of fire safety 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. 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 is less successful schemes which fail to achieve the highest standards of fire safety.

3.11.3 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.

3.11.4 Policy D3 Inclusive design requires development to incorporate safe and dignified emergency evacuation for all building users, by as independent means as possible. Where lifts are installed, Policy D3 Inclusive design requires a minimum of one lift per core to be a fire evacuation lift, which incorporating suitable levels of fire resistance to elements of construction forming refuges, evacuation lift enclosures, and lobbies.

3.11.5 **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. Planning departments should 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.

Policy D12 Agent of Change

A The Agent of Change principle places the responsibility for mitigating impacts from existing noise-generating activities or uses on the proposed new noise-sensitive development.

B Boroughs should ensure that planning decisions reflect the Agent of Change principle and take account of existing noise-generating uses in a sensitive manner when new development, particularly residential, is proposed nearby.

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

1) ensuring good acoustic design to mitigate and minimise existing and potential impacts of noise generated by existing uses located in the area

2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions secured through planning obligations

3) separating new noise-sensitive development where possible from existing noise-generating businesses through distance, screening, internal layout, sound-proofing and insulation, and other acoustic design measures.

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

E New noise-generating development, such as industrial uses, music venues, pubs, rail infrastructure, schools and sporting venues proposed close to residential and other noise-sensitive development should put in place measures such as soundproofing to mitigate and manage any noise impacts for neighbouring residents and businesses.

F Boroughs should refuse development proposals that have not clearly demonstrated how noise impacts will be mitigated and managed.

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

3.12.2 The **Agent of Change principle** places the responsibility for mitigating the impact of noise firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, applicants will need to design them in a more sensitive way to protect the new occupiers, such as new residents, businesses, schools and religious institutions, from noise impacts. This could include paying for soundproofing for the existing noise-generating uses, such as an existing music venue. The Agent of Change principle works both ways. 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.

3.12.3 The Agent of Change principle is included in the National Planning Policy Framework at paragraph 123 and Planning Practice Guidance provides further information on how to mitigate the adverse impacts of noise[32].

3.12.4 Noise-generating **cultural venues** such as theatres, concert halls, pubs and live music venues 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.

3.12.5 Housing and other **noise-sensitive development** proposed near to an existing noise-generating use should include necessary acoustic design measures. This will ensure new development has effective sound insulation to mitigate and minimise potential noise impact 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.

3.12.6 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.

3.12.7 **Noise impact assessments** accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the noise characteristics of existing uses can be properly captured and assessed. For example, cultural venues 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 noise impact assessments to ensure a full and accurate assessment.

3.12.8 Reference should be made to Policy D13 Noise which considers the impacts of noise-generating activities on a wider scale. **Further guidance** on managing and mitigating noise in mixed-use development and town centre development is also provided in the Mayor's London Environment Strategy.

32 NPPG, https://www.gov.uk/guidance/noise--2#contents

Policy D13 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 to ensure measures do not add unduly to the costs and administrative burdens on existing noise-generating uses
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 development
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 or internal layout – 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.

3.13.1 The **management of noise** is about encouraging the right acoustic environment 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 species.

3.13.2 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 impacted by the introduction of new noise-sensitive uses.

3.13.3 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.

3.13.4 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[33].

3.13.5 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**.

3.13.6 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

33 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.

Metropolitan Open Land and local green spaces as potential Quiet Areas that boroughs may wish to designate[34].

34 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/276228/noise-action-plan-agglomerations-201401.pdf

Chapter 4

Housing



Policy H1 Increasing housing supply

A Table 4.1 sets the ten-year targets for net housing completions which 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:

1) boroughs should 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) boroughs should 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 of a Tube station, rail station or town centre boundary[35]
   b) mixed-use redevelopment of car parks and low-density retail parks
   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 housing 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 London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

35 District, major, metropolitan and international town centres

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 which identify the sources of housing capacity (including windfall) expected to contribute towards achieving housing targets and should work with the Mayor to resolve any anticipated shortfalls.

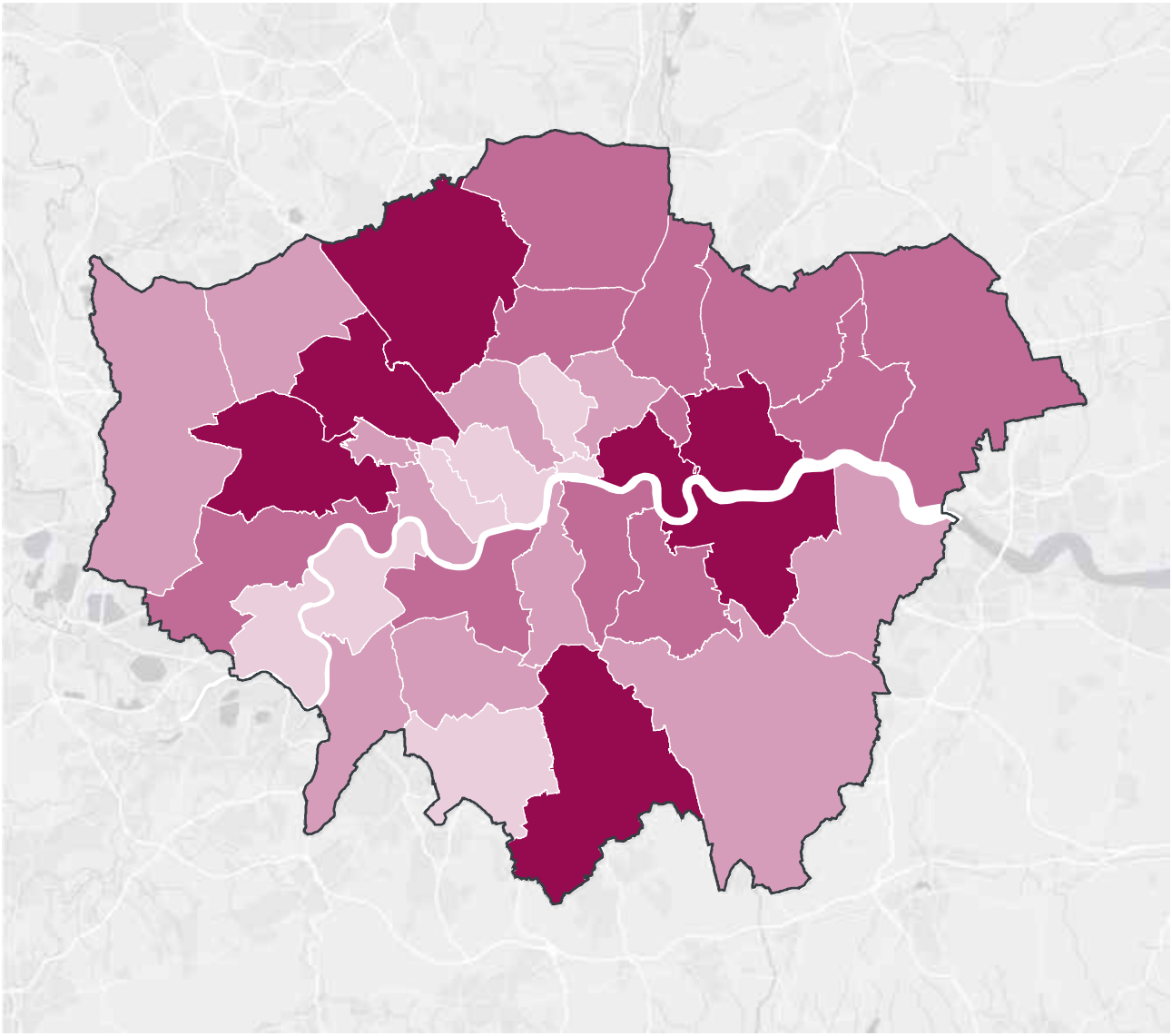
E Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.

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.

Table 4.1 - 10 year targets for net housing completions (2019/20 -2028/29)

Planning Authority	Ten-year housing target	Annualised average
Barking & Dagenham	22,640	2,264
Barnet	31,340	3,134
Bexley	12,450	1,245
Brent	29,150	2,915
Bromley	14,240	1,424
Camden	10,860	1,086
City of London	1,460	146
Croydon	29,490	2,949
Ealing	28,070	2,807
Enfield	18,760	1,876
Greenwich	32,040	3,204
Hackney	13,300	1,330
Hammersmith & Fulham	16,480	1,648
Haringey	19,580	1,958
Harrow	13,920	1,392
Havering	18,750	1,875
Hillingdon	15,530	1,553
Hounslow	21,820	2,182
Islington	7,750	775
Kensington & Chelsea	4,880	488
Kingston	13,640	1,364
Lambeth	15,890	1,589
Lewisham	21,170	2,117
London Legacy Development Corporation	21,610	2,161
Merton	13,280	1,328
Newham	38,500	3,850
Old Oak Park Royal Development Corporation	13,670	1,367
Redbridge	19,790	1,979
Richmond	8,110	811
Southwark	25,540	2,554
Sutton	9,390	939
Tower Hamlets	35,110	3,511
Waltham Forest	17,940	1,794
Wandsworth	23,100	2,310
Westminster	10,100	1,010
Total	**649,350**	**64,935**

Figure 4.1 - 10 Year Housing Target for Net Completions



10 Year Housing Target for Net Completions

- 25,541 - 38,500
- 16,481 - 25,540
- 10,101 - 16,480
- 1,460 - 38,500

Source: GLA Planning

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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[36] 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 To achieve these housing targets the overall average rate of **housing delivery** on both large and small sites will need to approximately double compared to current average completion rates. 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

36 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.

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 objectives. Their effectiveness will be monitored and the Mayor will consider other measures if necessary.

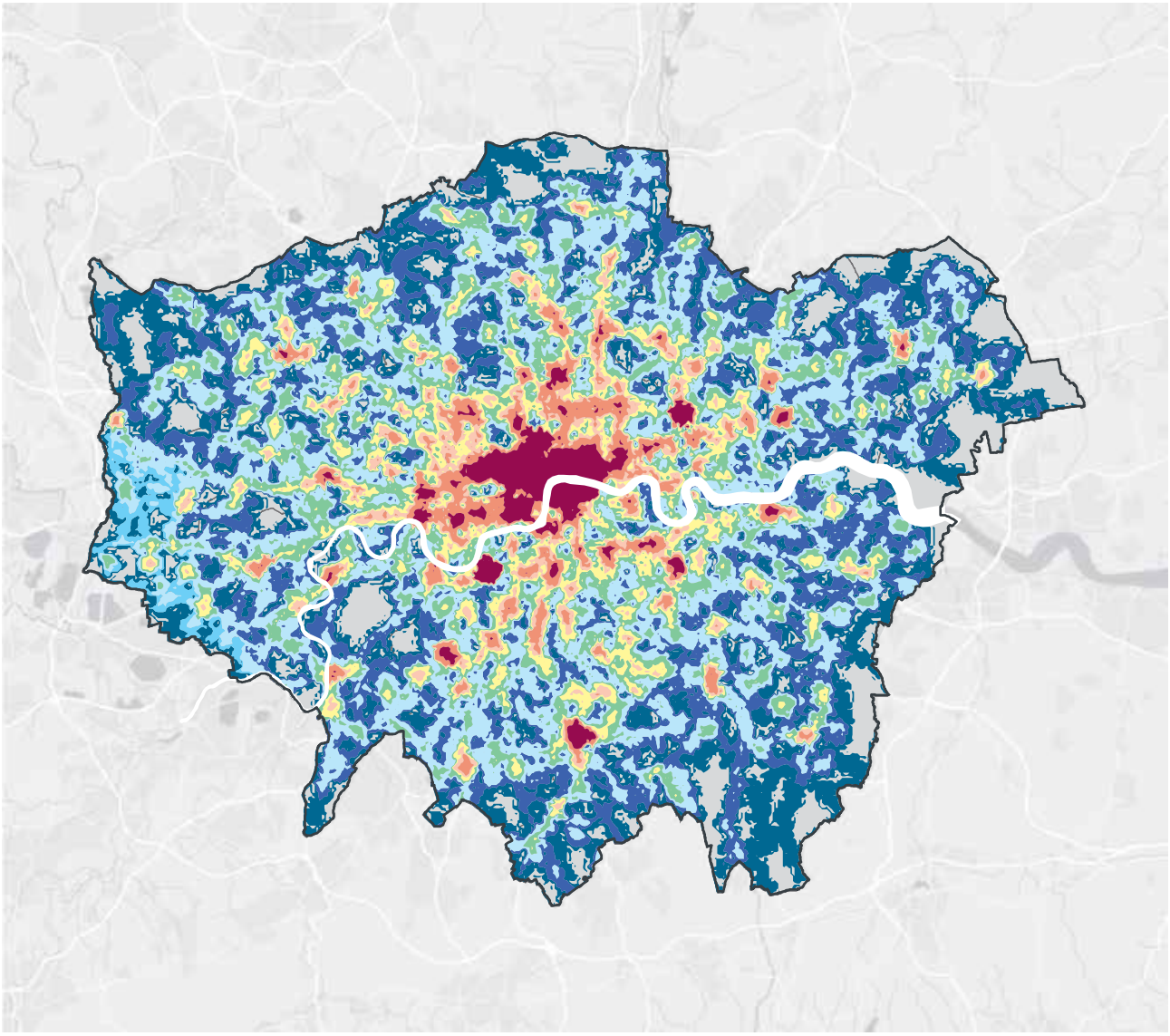
4.1.7 **The ten-year housing targets** in Table 4.1 are based on the 2017 London SHLAA. This includes an assessment of large housing sites (0.25 hectares and above) undertaken in partnership with boroughs, which provides the most comprehensive study available of the capital's capacity for housing delivery 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[37]. 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 24,500 new homes a year. The allowance for windfall sites (that are not specifically

37 For a full discussion of the SHLAA methodology and findings see 2017 SHLAA report.

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 increases in the density of existing homes through small housing developments. Boroughs are encouraged to identify as many sites, including small sites, as possible via their Development Plan documents and brownfield registers. 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 below. This is because, in contrast with recent annual trends on small sites, the figures in Table 4.2 are considered to better reflect the step change that can be expected in housing delivery through the presumption in favour of small housing developments (Policy H2 Small sites) and the package of measures outlined in the London Housing Strategy.

Figure 4.2 - Public Transport Access Levels



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 Small sites should play a much greater role in housing delivery and boroughs should pro-actively support well-designed new homes on small sites 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.

B Boroughs should:

1) recognise in their Development Plans and planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments
2) prepare area-wide design codes to promote good design and to proactively encourage increased housing provision and higher residential densities on small housing developments. Design codes should provide clear guidelines and parameters for small housing developments and show how additional housing provision can be accommodated in different locations, drawing on the principles set out in this policy and Supplementary Planning Guidance provided by the GLA.

C Boroughs should increase planning certainty on small sites by:

1) identifying and allocating appropriate small sites for residential development
2) listing these sites on their brownfield registers
3) granting permission in principle on specific sites or preparing local development orders.

D To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:

1) infill development on vacant or underused sites

2) proposals to increase the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary through:
    a) residential conversions
    b) residential extensions
    c) the demolition and redevelopment of existing buildings
    d) infill development within the curtilage of a house
3) the redevelopment or upward extension of flats and non-residential buildings to provide additional housing.

E For the purposes of part D, the presumption in favour of small housing developments means approving small housing developments which are in accordance with a design code developed in accordance with part B. Where there is no such design code, the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision.

F The presumption in favour of small housing developments should not be applied to:

1) statutory listed buildings
2) developments providing more than 25 homes
3) proposals that do not provide net additional housing
4) sites of more than 0.25 hectares in size
5) non-self contained housing schemes
6) mixed-use proposals within the Central Activities Zone (CAZ)
7) estate regeneration schemes.

G New build homes on sites capable of accommodating ten units or fewer which are on the ground floor should meet M4(2) standard for 'accessible and adaptable dwellings' and provide step-free access. New build homes on these sized sites that are not on the ground floor do not need to meet M4(2) standards and can comply with the M4(1) standard, which does not require step-free access.

H Boroughs wishing to apply affordable housing requirements to sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions. Boroughs are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development.

4.2.1 For London to meet its housing needs, **small housing developments** of between one and 25 homes must make a substantially greater contribution to new supply across the city. Therefore, increasing the rate of housing delivery from small housing 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[38]
- supporting town centre economies
- as with large sites, providing opportunities to support the use of modern methods of construction.

4.2.3 The **one to 25-unit threshold** set out in Policy H2 Small sites which triggers the application of this policy is considered to be representative of small housing developments across London and for this reason differs

38 See Glossary.

from that used in Planning Practice Guidance[39] and the definition of 'major development' in planning legislation[40].

4.2.4 The **small sites 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.

4.2.5 **Incremental intensification** of existing residential areas within PTALs 3-6 and within 800m of a Tube station, rail station or town centre boundary is expected to play an important role in meeting the housing targets for small sites, particularly in outer London. This can take a number of forms including new build, infill development, conversions, demolition and redevelopment or extension of existing buildings, where this results in net additional housing provision. Within these areas, there is a need for the character of some neighbourhoods to evolve to accommodate additional housing. Therefore, the emphasis of decision-making should change from preserving what is there at the moment towards encouraging and facilitating the delivery of well-designed additional housing to meet London's needs.

4.2.6 The Mayor will set out **design principles** for small housing developments across London as part of his review of GLA design guidance, which boroughs should draw on and supplement when preparing design codes. Design codes can be combined with local development orders, where appropriate.

4.2.7 Special attention will be required within **conservation areas** to ensure that increased housing provision is accommodated in a way that also complements and enhances an area, taking into account conservation area character appraisals and management plans.

39 DCLG, Planning Practice Guidance, Planning obligations, Paragraph: 031 Reference ID: 23b-031-20161116

40 The Town and Country Planning (Development Management Procedure) (England) Order 2010, Article 2

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	Annualised average
Barking & Dagenham	5,190	519
Barnet	12,040	1204
Bexley	8,650	865
Brent	10,230	1023
Bromley	10,290	1029
Camden	3,760	376
City of London	740	74
Croydon	15,110	1511
Ealing	10,740	1074
Enfield	9,830	983
Greenwich	6,810	681
Hackney	6,600	660
Hammersmith & Fulham	2,980	298
Haringey	6,260	626
Harrow	9,650	965
Havering	9,040	904
Hillingdon	7,650	765
Hounslow	6,800	680
Islington	4,840	484
Kensington & Chelsea	1,690	169
Kingston	6,250	625
Lambeth	6,540	654
Lewisham	8,290	829
London Legacy Development Corporation	800	80
Merton	6,710	671
Newham	9,500	950
Old Oak Park Royal Development Corporation	60	6
Redbridge	9,380	938
Richmond	6,340	634
Southwark	8,000	800
Sutton	7,380	738
Tower Hamlets	5,660	566
Waltham Forest	8,890	889
Wandsworth	7,740	774
Westminster	5,290	529
Total	**245,730**	**24,573**

4.2.8 Small housing developments are envisaged to be within close proximity to existing homes. These should be carefully and creatively designed to avoid an unacceptable level of harm to the amenity of surrounding properties in relation to privacy, for example through the placement and design of windows and the use of landscaping. Environmental and architectural innovation should be supported and schemes should achieve **good design** and ensure that existing and proposed homes benefit from satisfactory levels of daylight and sunlight. All homes must meet the housing standards in Policy D4 Housing quality and standards, including the provision of private open space.

4.2.9 Loss of existing biodiversity or **green space,** as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates.

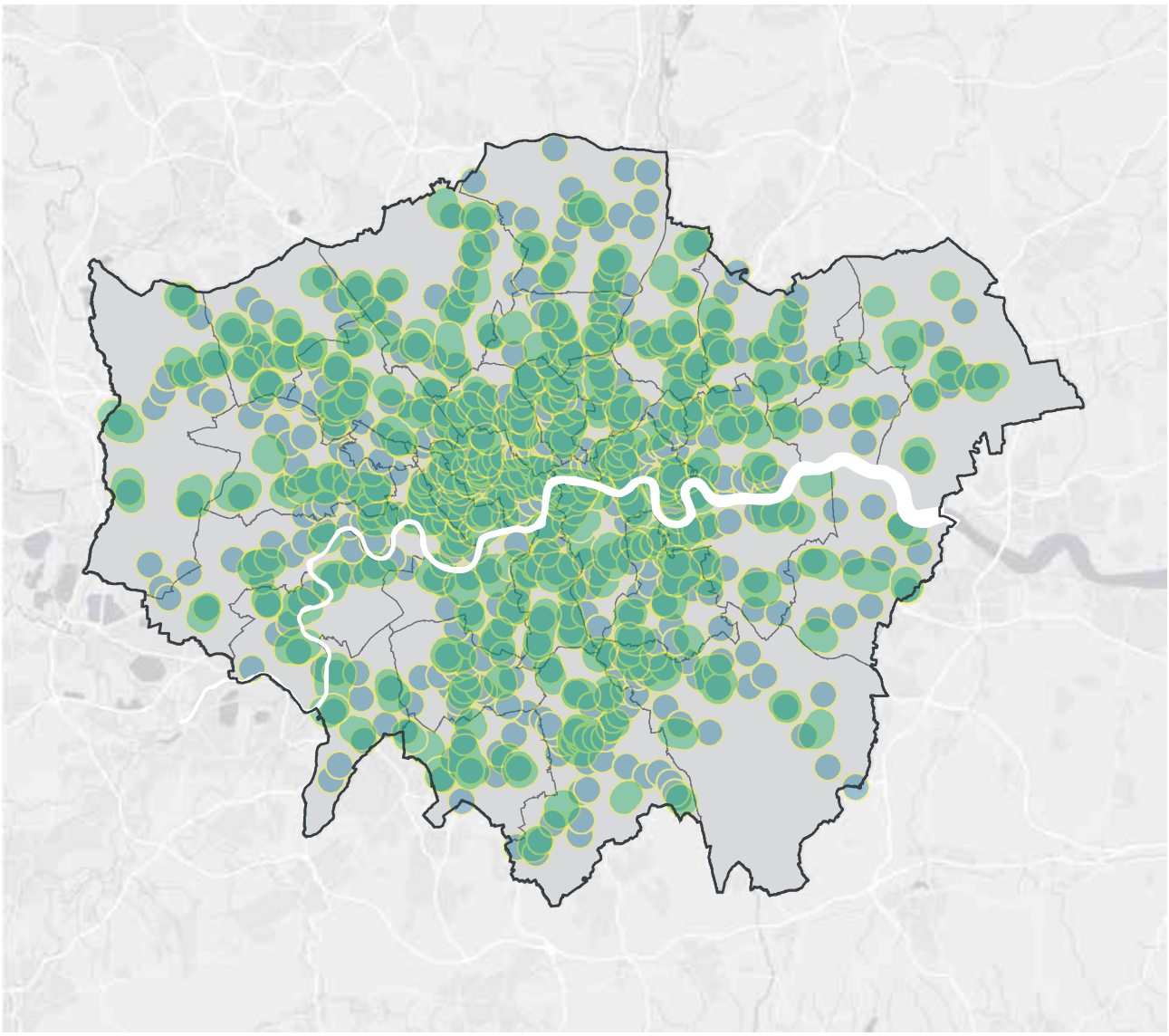
4.2.10 Small sites can be particularly suitable for well-designed **community-led housing**[41] projects. Boroughs should support such projects where these developments are integrated with existing neighbourhoods and support mixed and inclusive communities.

4.2.11 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.

4.2.12 As demonstrated by the 2017 SHMA, London has significant unmet need for **affordable housing**. For some boroughs, sites of ten or fewer units are the main source of supply and play an important role in contributing to affordable housing delivery, often via cash in lieu contributions which are then used as part of borough-wide affordable housing programmes. Given the important role these sites play, the Mayor believes that boroughs should be capable of securing cash in lieu contributions for affordable housing contributions from such sites. Therefore, boroughs are encouraged to include policies requiring affordable housing from such sites of ten or fewer units in their Development Plans.

41 See Glossary.

Figure 4.3 - Proximity to town centres



Proximity to Town Centres
Walking distance

- 800m distance to a London Underground Station
- 800m distance to a Town Centre

Source: Transport for London (TfL)

Contains OS data © Crown copyright and database right (2017)

4.2.13 For practical reasons associated with on-site provision of a small number of affordable units (such as management), contributions on sites delivering ten or fewer units should be asked for as a **cash in lieu contribution**. Boroughs should have an identified programme through which additional affordable homes will be delivered. Flexibility should be allowed in the timing of payments in recognition of the distinct economics of small and medium-sized housebuilders and to reduce their up-front costs.

Policy H3 Monitoring housing targets

A The ten-year housing targets set out in Table 4.1 should be monitored in net terms taking into account homes lost through demolition or change of use.

B Net housing delivery on sites of less than 0.25 hectares should contribute towards achieving the small sites targets in Table 4.2.

C Net non-self-contained accommodation for students and shared living schemes should count towards meeting housing targets on the basis of a 3:1 ratio, with three bedrooms being counted as a single home.

D 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.

4.3.1 The **annual averages** in Table 4.1 provide a benchmark for assessing the direction of travel towards ten-year housing targets both across London and by borough. There will inevitably be variations in 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 completions and the net pipeline of approved homes when assessing progress towards delivering the London Plan housing targets (see Chapter 12 - Monitoring).

4.3.2 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.

4.3.3 Given that London Plan targets have increased significantly from the last London Plan to address housing need, it is the Mayor's view that the **Government's proposed housing delivery test** should not unfairly

penalise boroughs where housing delivery has been constrained due to factors that are outside their control. For example, where key allocations or approval sites are expected to make a significant contribution to housing targets but have stalled due to non-planning related reasons, or will come forward later in the 10-year period. Housing completions against the London Plan small sites target are also likely to increase over time, as Policy H2 Small sites is implemented, so this should be taken into account when monitoring housing delivery during the early years of the Plan. 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[42].

Policy H4 Meanwhile use

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.

4.4.1 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 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.

4.4.2 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.

4.4.3 The **time period** for meanwhile uses will vary with 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,

42 For more detail on this see the 2017 SHLAA report.

in order to support the viability and delivery of meanwhile housing developments.

Policy H5 Delivering affordable housing

A The strategic target is for 50 per cent of all new homes delivered across London to be affordable. Specific measures to achieve this aim include:

1) requiring residential and mixed-use developments to provide affordable housing through the threshold approach (Policy H6 Threshold approach to applications)
2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided
3) affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio
4) public sector land delivering at least 50 per cent affordable housing across its portfolio
5) strategic partners with agreements with the Mayor aiming to deliver at least 60 per cent affordable housing across their portfolio.

B Affordable housing should be provided on site in order to deliver communities which are inclusive and mixed by tenure and household income, providing choice to a range of Londoners. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

4.5.1 **Delivering more affordable housing**[43] is a key strategic issue for London. Meeting the need for circa 43,500 affordable homes per year, as established in the 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.

43 The Glossary provides the definition of affordable housing, this is consistent with the 2012 NPPF definition of affordable housing. Within this broad definition, sections 4.7.3 - 4.7.6 of this Plan set out the Mayor's preferred tenures.

4.5.2 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[44], and consistent with the requirements in part C of Policy H6 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. 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 H6 Threshold approach to applications, in order to ensure that affordable housing contributions are increased if viability improves over time.

4.5.3 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 H6 Threshold approach to applications and the Mayor's Affordable Housing and Viability SPG, should a lower level of affordable housing be considered.

4.5.4 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 H6 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

44 Public subsidy includes grant, public loans (including the Mayor's London Housing Bank) and any public land at a reduced cost.

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.

4.5.5 Affordable housing should be delivered on site to help deliver mixed and inclusive communities. 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.

4.5.6 **Cash in lieu** contributions should be used in even more limited circumstances[45], 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.

4.5.7 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.

4.5.8 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[46].

4.5.9 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

45 For exceptions see part F of Policy H2 Small sites and Policy H18 Large-scale purpose-built shared living.

46 Community Infrastructure Levy Regulations 2010 (SI 2010 No 948), Regulation 122(2). Crown Copyright, 2010

affordable housing provided across the main site and any linked sites when considered as a whole.

4.5.10 Boroughs must have in place **monitoring arrangements** to ensure that the additional homes are delivered. As per Policy H8 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.

Policy H6 Threshold approach to applications

A The threshold approach applies to development proposals which are capable of delivering more than ten units or which have a combined floor space greater than 1,000 sqm (see paragraph 4.6.14 for exclusions to the threshold approach and 4.6.15 for scheme types with bespoke approaches).

B The threshold level of affordable housing is initially set at:

1) a minimum of 35 per cent
2) 50 per cent for public sector land
3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

The 35 per cent threshold will be reviewed in 2021 and if appropriate increased through Supplementary Planning Guidance.

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 (Policy H7 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 H5 Delivering affordable housing and have sought grant where required to increase the level of affordable housing beyond 35 per cent.

D 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).

E 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.

F 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

G For schemes that were approved under 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.

H For schemes where the original permission did not meet the threshold or required tenure split, viability information will be required where an application is submitted to vary the consent and this would alter the

economic circumstances of the scheme. Such cases will be assessed under the Viability Tested Route.

I 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.

J 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 permission.

4.6.1 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.

4.6.2 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.

4.6.3 The percentage of affordable housing on a scheme should be measured in **habitable rooms** 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**. Applicants should present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison.

4.6.4 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 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.

4.6.5 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. 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.

4.6.6 Given the difference in values between industrial and residential development, where Strategic Industrial Locations, Locally Significant Industrial Sites or other industrial sites are deemed acceptable for release (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function), they are expected to deliver a higher level of affordable housing. If this is not possible, detailed viability evidence will be needed to justify a lower level of affordable housing. Therefore, to follow the Fast Track Route **industrial sites** will need to meet the 50 per cent threshold.

4.6.7 Where the level of affordable housing offered meets the criteria of part C of Policy H6, 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).

4.6.8 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 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.

4.6.9 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 2016-21[47]. 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.

4.6.10 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.

4.6.11 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+ 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.

4.6.12 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.

47 https://www.london.gov.uk/file/11941201.

4.6.13 In Opportunity Areas, boroughs may want to consider applying a **localised affordable housing threshold** for the Fast Track Route or fixed affordable housing requirements. This approach could help provide certainty to developers and land owners and help prevent land price rises based on hope value. Localised affordable housing thresholds, or fixed affordable housing requirements should increase the affordable housing provision beyond 35 per cent where possible. Boroughs may also consider a local approach in terms of tenure mix. The London Plan threshold approach will apply in Opportunity Areas where a local approach has not been progressed.

4.6.14 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 dwellings** which should follow the approach set out in Policy H10 Redevelopment of existing housing and estate regeneration
- schemes claiming the **vacant building credit** (see Policy H9 Vacant building credit).

4.6.15 The approach for Build to Rent schemes, where they meet the definition, is set out Policy H13 Build to Rent.

4.6.16 Policy H15 Specialist older persons housing, Policy H17 Purpose-built student accommodation and Policy H18 Large-scale purpose-built shared living set out specific affordable housing approaches in those types of development.

Policy H7 Affordable housing tenure

A The Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:

1) a minimum of 30 per cent low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/ London Affordable Rent)
2) a minimum of 30 per cent intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared ownership

3) 40 per cent to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.

These minimums will be reviewed in 2021, and if necessary, updated through Supplementary Planning Guidance.

B Only schemes delivering the threshold level of affordable housing with a tenure split that meets the requirements set out in part A can follow the Fast Track Route for viability.

4.7.1 As Table 4.3 demonstrates, the 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 Policy H7 Affordable housing tenure 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. These minimums will be reviewed in 2021 and, if necessary, updated through Supplementary Planning Guidance, taking account of future affordable housing funding agreements.

4.7.2 There is a presumption that the **40 per cent to be decided by the borough** will focus on Social Rent/ 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.

Table 4.3 - 2017 SHMA findings

Tenure	1bed	2bed	3bed	4+bed	Total	% of total
Market	10,682	2,043	4,101	6,210	23,037	35%
Intermediate	4,334	3,434	2,409	1,693	11,869	18%
Low-cost rent	21,318	5,311	2,462	1,881	30,972	47%
Total	**36,335**	**10,788**	**8,971**	**9,783**	**65,878**	**100%**
% of total	**55%**	**16%**	**14%**	**15%**	**100%**	

4.7.3 Within the broad definition of affordable housing[48], the Mayor's **preferred affordable housing tenures** are:

- London Affordable Rent
- London Living Rent
- London Shared Ownership.

These are described in more detail below.

4.7.4 **London Affordable Rent** is rent for households on low income with the rent level based on social rent levels. The NPPF defines affordable rent as up to 80 per cent of market rent, however, to ensure rents in London are genuinely affordable, the Mayor expects rents charged for homes let for London Affordable Rent to be set at benchmarks substantially below this level, based on traditional social rents. More detail is contained within the Mayor's Homes for Londoners Affordable Homes Programme 2016-21 funding guidance. These homes will be allocated in accordance with need (based on the borough's allocations policy).

4.7.5 **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[49].

48 See the Glossary for broad definition of affordable housing which is consistent with the 2012 NPPF.

49 Further details on LLR can be found in the London Housing Strategy, draft for public consultation.

4.7.6 **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.

4.7.7 **Other affordable housing products** may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the draft London Housing Strategy[50] definition of genuinely affordable housing and are considered by the borough to be genuinely affordable.

4.7.8 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 in the Annual Monitoring Report. The caps will be reviewed and updated where necessary in the Annual Monitoring Report.

4.7.9 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.

4.7.10 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.

4.7.11 To follow the Fast Track Route, the threshold level of affordable housing must adhere to the **tenure split** set out in Policy H7 Affordable housing tenure. Where a scheme is delivering more than the threshold, the tenure of the additional affordable housing (above the threshold) is flexible and should be agreed between the borough, Registered Provider and applicant.

50 Mayor of London, September 2017, London Housing Strategy, draft for public consultation

4.7.12 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 H7 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 Section 106 agreements should stipulate the tenure mix for a scheme and this should be consistent with the assumptions in the viability assessment.

4.7.13 To incentivise schemes that are largely or entirely affordable housing, schemes that propose 75 per cent or more affordable housing, consistent with the glossary definition of affordable housing, may be considered under the Fast Track Route whatever the affordable housing tenure mix as long as the tenure and type of home are supported by the borough and, where relevant, the Mayor, as being genuinely affordable. 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.

Policy H8 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 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 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.

4.8.1 Policy H5 Delivering affordable housing, Policy H6 Threshold approach to applications and Policy H7 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 H8 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 H9 Vacant building credit

A The Vacant Building Credit is unlikely to bring forward additional development in London, therefore in most circumstances, its application will not be appropriate in London. However, there may be some limited circumstances where the credit would, in line with the intention of the credit, provide an incentive for development on sites containing vacant buildings that would not otherwise come forward for development. As part of assessing whether this is the case, decision-makers are advised to take account of the criteria below as well as locally-specific factors influencing the site.

B In the limited circumstance where a borough feels the credit should be applied, boroughs are advised to consider applying the credit only where all of the following criteria are met:

1) the building is not in use at the time the application is submitted
2) the building is not covered by an extant or recently expired permission
3) the site is not protected for alternative land use
4) the building has not been made vacant for the sole purpose of redevelopment.

C To demonstrate that a building has not been made vacant for the sole purpose of redevelopment, an applicant will be required to demonstrate that it has been vacant for a continuous period of at least five years before the application was submitted and will also be required to provide evidence that the site has been actively marketed for at least two of those five years at realistic prices.

4.9.1 In 2014 the Government introduced a **Vacant Building Credit** (VBC), which applies to sites where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building. The VBC reduces the requirement for affordable housing contributions based on the amount of vacant floor space being brought back into use or redeveloped. This has significant implications for delivery of affordable housing in London where a high proportion of development is on brownfield land where there are existing buildings.

4.9.2 Decision-makers are encouraged to take account of: the current need for affordable housing in London (both at the local and strategic level); the rate of past delivery against local and strategic targets; the requirement of the NPPF to seek to meet objectively assessed need; the fact that brownfield sites come forward for development without such an incentive; and that procedures are already in place for considering the viability of development where there are barriers to delivery.

4.9.3 It should be noted that if an applicant is claiming that the scheme qualifies for VBC, it cannot also claim Community Infrastructure Levy relief through the vacancy test.

4.9.4 Further guidance is provided in the Affordable Housing and Viability SPG.

Policy H10 Redevelopment of existing housing and estate regeneration

A Loss of existing housing is generally only acceptable where the housing is replaced at existing or higher densities with at least the equivalent level of overall floorspace. This includes the loss of hostels, staff accommodation, and shared and supported accommodation that meet an identified housing need, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.

B Where loss of existing affordable housing is proposed, it should not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace, and generally should produce an uplift in affordable housing provision. All such schemes are required to follow the Viability Tested Route (see Policy H6 Threshold approach to applications).

C For estate regeneration schemes the existing affordable housing floorspace should be replaced on an equivalent basis i.e. where social

rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost, and the delivery of additional affordable housing should be maximised. All schemes should follow the Viability Tested Route (see Policy H6 Threshold approach to applications).

4.10.1 The **regeneration and intensification** of London's housing areas has been, and will continue to be, a key part of the evolution of London, and critical to meeting its housing needs. It is important that existing homes of all tenures are well-maintained and are of good quality as these will continue to be the bulk of London's housing stock[51].

4.10.2 The **aims of an estate regeneration project** will typically fall into three broad categories. These are:

- maintaining good quality homes
- maintaining safe and good quality homes
- improving the social, economic and physical environment in which homes are located.

4.10.3 In some cases, regeneration will include the loss and replacement of homes and it is important that any such scheme is delivered with existing and new residents and communities in mind. This is particularly pertinent for estate regeneration, and any proposals for such schemes should take account of the requirements of the **Mayor's Good Practice Guide**.

4.10.4 It is important to ensure that estate regeneration does not lead to the loss of affordable housing and that it delivers an **uplift in affordable housing** where possible. All estate regeneration schemes should go through the Viability Tested Route and maximise the delivery of any additional affordable housing. For the purposes of this policy, existing affordable housing floorspace includes both occupied and vacant floorspace.

4.10.5 Where a borough 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, (further guidance is provided in the Affordable Housing and

51 The Mayor's latest Housing Strategy can be found at https://www.london.gov.uk/what-we-do/housing-and-land

Viability SPG). Where this is proposed, 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 H11 Ensuring the best use of stock

A Boroughs should promote efficient use of existing stock by using all the tools available to reduce the number of vacant dwellings.

B The Mayor will support boroughs with identified issues of homes being left empty as 'buy to leave' properties to put in place mechanisms which seek to ensure stock is occupied.

C Boroughs should take account of the impact on the housing stock of applications for homes to be used as holiday rentals for more than 90 days a year.

4.11.1 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 numbers of **long-term vacant properties** in London has decreased significantly and is now below one per cent of the housing stock[52], 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 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.

4.11.2 In addition, the use of dwellings as short-term **holiday rentals** can have a significant impact on the supply of homes in an area that are available for people to live in. Homes should not be used as short-term holiday rented accommodation for a cumulative period of more than 90 days a year without seeking planning permission.

52 Table 615 from https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants

Policy H12 Housing size mix

A 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) the range of housing need and demand identified by the London Strategic Housing Market Assessment and, where relevant, local assessments
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
6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in more central or urban locations
7) the aim to optimise housing potential on sites
8) the ability of new development to reduce pressure on conversion and sub-division of existing stock
9) the role of one and two bed units in freeing up family housing
10) the potential for custom-build and community-led housing schemes.

B Generally, schemes consisting mainly of one-person units and/or one-bedroom units should be resisted.

C Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.

D 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) the criteria set out in part A
2) the local and strategic need for affordable family accommodation
3) local issues of overcrowding
4) the impact of welfare reform
5) the cost of delivering larger units and the availability of grant.

4.12.1 Table 4.3 shows the mix of homes identified in the London 2017 Strategic Housing Market Assessment.

4.12.2 Policy H12 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 should not set policies or guidance that require set proportions of different-sized (in terms of number of bedrooms) market or intermediate units to be delivered. Such policies are inflexible, often not implemented effectively and generally do not reflect the optimum mix for a site taking account of all the factors set out in part A of Policy H12 Housing size mix. Moreover, they do not necessarily meet the identified need for which they are being required; for example, larger units are often required by boroughs in order to meet the needs of families but many such units are instead occupied by sharers. In addition, local and strategic housing need figures for market homes will be heavily influenced by the assumptions made in the assessment about the level of under-occupation in the private sector. 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.

4.12.3 **Family units** have historically been considered to be those consisting of three or more bedrooms. However, as many families do live in two-bedroom units this should be taken into account when assessing the needs that different sized units can meet (in terms of bedrooms) and the design and approach to management of a development both for market and affordable housing.

4.12.4 Well-designed **one- and two- bedroom units** in suitable locations can also 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.

4.12.5 While **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, one-person and one-bed units are the least flexible unit type. Thus, unless supported by the borough as meeting an identified need, schemes consisting of over 10 units which mainly comprise of one-person/one-bed units should be avoided to ensure that there is a mix of unit sizes. Specific guidance on large-scale purpose-built shared living schemes can be found in Policy H18 Large-scale purpose-built shared living.

4.12.6 As part of their housing strategy functions, local authorities are required to have an understanding of housing needs in their area and this, along with their local Housing Register, will provide the evidence for the **size of affordable homes** (in terms of number of bedrooms) required to meet identified need. Combined with the considerations set out in part A of Policy H12 Housing size mix, 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 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.

4.12.7 **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 H13 Build to Rent

A To recognise that the Build to Rent development model differs from a traditional for sale scheme and the potential role it can play in accelerating delivery, where a development meets the criteria set out below, the affordable housing offer can be solely Discounted Market Rent at a genuinely affordable rent, preferably London Living Rent level. Affordable housing should be secured in perpetuity.

B To qualify as a Build to Rent scheme within the context of this policy, all the following criteria must be met:

1) the development, or block or phase within the development has at least 50 units[53]
2) the homes are held as Build to Rent under a covenant for at least 15 years[54]
3) a clawback mechanism is in place to recoup additional affordable housing contributions in the event of the covenant being broken
4) all the units are self-contained and let separately
5) there is unified ownership and unified management of the development
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 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 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
10) providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

C For Build to Rent schemes to follow the Fast Track Route they must deliver at least 35 per cent affordable housing, of which at least 30 per cent should be at London Living Rent Level, with the remainder being at a range of discounts below market rent to be agreed with the borough

53 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.

54 Covenant periods are expected to increase as the market matures.

and/or the Mayor where relevant. Schemes must also meet all other requirements of part C of Policy H6 Threshold approach to applications. This threshold and affordable housing tenure split, will be reviewed and if necessary updated in 2021, through Supplementary Planning Guidance.

D Where the requirements of C above are not met, schemes must follow the Viability Tested Route set out in Policy H6. 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.

4.13.1 The planning system 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'[55] 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.

55 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.

4.13.2 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

4.13.3 Where a developer is proposing a Build to Rent development which meets the definition set out in Policy H13 Build to Rent, 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 be fully integrated into the development with no differences between DMR and market units.

4.13.4 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.

4.13.5 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.

4.13.6 To follow the **Fast Track Route** at least 30 per cent of the affordable housing must be let at London Living Rent levels. The remainder should be provided at a range of discounts below market rent based on local need to be agreed with the borough and Mayor where relevant, for example with half of remaining units at 50 per cent and half at 70 per cent of market rents.

4.13.7 Proposals that do not provide 35 per cent affordable housing at the required discount to market rents or that do not meet the criteria of part C of Policy H6 Threshold approach to applications will be subject to the

Viability Tested Route under part E of Policy H6 Threshold approach to applications.

4.13.8 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.

4.13.9 Schemes that do not meet the Build to Rent definition set out in Policy H13 Build to Rent 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.

4.13.10 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[56].

4.13.11 The majority of DMR products, where they meet the requirements of the Community Infrastructure Levy (CIL) regulations qualify for **mandatory CIL relief**[57].

4.13.12 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 land, including exploring the use of joint ventures or deferred receipts.

4.13.13 Further guidance on Build to Rent schemes can be found in the Mayor's Affordable Housing and Viability SPG.

56 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.

57 The Community Infrastructure Levy (Amendment) Regulation 2015 – amendment to Part 6 – exemptions and reliefs.

Policy H14 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 D5 Accessible housing). Supported and specialised accommodation could include:

1) move-on accommodation for people leaving hostels, refuges and other supported housing, to enable them to live independently
2) accommodation for young people
3) re-ablement 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.

4.14.1 Boroughs should undertake **assessments of the short and long-term needs for supported and specialised accommodation** within their borough. 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 met on a multi-borough or pan-London basis.

Policy H15 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 and strategic housing needs information and the indicative benchmarks set out in Table 4.4
2) the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, access to social infrastructure, health care and public transport facilities
3) the increasing need for accommodation suitable for people with dementia.

B Specialist older persons housing (Use Class C3) provision should deliver:

1) affordable housing in accordance with Policy H5 Delivering affordable housing, and Policy H6 Threshold approach to applications
2) accessible housing in accordance with Policy D5 Accessible housing
3) the highest standards of accessible and inclusive design in accordance with Policy D3 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.

C Sheltered accommodation and extra care accommodation is considered as being in Use Class C3. Residential nursing care accommodation (including end of life/ hospice care and dementia care home accommodation) is considered as being in Use Class C2.

4.15.1 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**.

4.15.2 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.

4.15.3 In some circumstances, older people may choose to seek alternative, more tailored **specialist accommodation**. There is a range of specialist accommodation options and the following definitions should be applied in London:

- **sheltered accommodation and extra care accommodation should be considered as C3 housing**:
- **sheltered accommodation** (also referred to as supported housing) is self-contained accommodation specifically designed and managed for older people (minimum age of 55 years) who require no or a low level of support. Schemes normally include additional communal facilities such as a residents' lounge and a scheme manager, warden or personal alarm/telecare system
- **extra care accommodation** (also referred to as assisted living, close care, or continuing care housing) is self-contained residential accommodation and associated facilities, designed and managed to meet the needs and aspirations of older people, and which provides 24-hour access to emergency support. A range of facilities are normally available such as a residents' lounge, laundry room, a restaurant or meal provision facilities, classes, and a base for health care workers. Domiciliary care will be available to varying levels, either as part of the accommodation package or as additional services which can be purchased if required

- **residential nursing care accommodation** (including end of life/ hospice care and dementia care home accommodation) **should be considered as C2** as it provides non-self contained residential accommodation for people who require additional personal or nursing care. Rooms may be private or shared and may provide an ensuite bathroom. Communal facilities are likely to include a dining room and residents' lounge, with meals and personal services routinely provided to all residents. Personal or nursing care is a critical part of the accommodation package at residential/nursing care accommodation. Care homes are unlikely to provide more than 80 bed spaces in total.

4.15.4 Research[58] 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 4.4 provides these requirements as annual borough indicative benchmarks for specialist older persons housing (C3) 2017-2029.

4.15.5 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.

4.15.6 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.

4.15.7 Specialist older persons accommodation should provide affordable housing in line with Policy H5 Delivering affordable housing and Policy H6 Threshold approach to applications. However, the **tenure split** requirements for specialist older person accommodation may differ to those set out in Policy H7 Affordable housing tenure. Where they do, they should be clearly set out in Development Plan Documents or supplementary guidance. Schemes meeting the threshold set out in Policy H6 Threshold approach to applications will be considered under the Fast Track Route, but developments not delivering this will be subject to the Viability Tested Route.

4.15.8 Specialist older persons housing developments should also provide a suitable level of **safe storage and charging facilities** for residents' mobility scooters, to prevent them from being stored in communal corridors or spaces which are not designed for this purpose.

4.15.9 **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.

58 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

Table 4.4 - Annual borough benchmarks for specialist older persons housing (C3) 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**

4.15.10 **Residential or nursing care 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.

Policy H16 Gypsy and Traveller accommodation

A Boroughs should plan to meet the identified need for permanent Gypsy and Traveller pitches.

B As of the start of this Plan period, boroughs should use the following definition of 'Gypsies and Travellers' as a basis for assessing need:

People with a cultural tradition of nomadism, or living in a caravan, whatever their race or origin, including:

1) those who are currently travelling or living in a caravan
2) those who currently live in bricks and mortar dwelling households whose existing accommodation is unsuitable for them by virtue of their cultural preference not to live in bricks and mortar accommodation
3) those who, on grounds of their own or their family's or dependants' educational or health needs or old age, have ceased to travel temporarily or permanently.

C Boroughs that have not undertaken a needs assessment since 2008 should either:

1) undertake a Gypsy and Traveller accommodation needs assessment within the first two years of this Plan period (based on the definition set out above); or
2) use the midpoint figure of need in Table 3 of GLA Gypsy and Traveller Accommodation Topic Paper 2017 as identified need for pitches (over the next 10 years) until a needs assessment is undertaken as part of their Development Plan review process.

D Boroughs that have undertaken a needs assessment since 2008 should update this (based on the definition set out above) as part of their Development Plan review process.

E Boroughs should undertake an audit of existing pitches and sites, identifying:

1) areas of overcrowding
2) areas of potential extra capacity within existing sites
3) pitches in need of refurbishment.

Boroughs should plan to address issues identified in the audits.

F Boroughs should actively plan to protect existing Gypsy and Traveller accommodation capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.

4.16.1 Estimates show there are around 30,000 Gypsies and Travellers in London[59]. Their culture and traditions have developed through a nomadic way of life over centuries, and although many Gypsies and Travellers try to maintain this, the **lack of pitches** on local authority sites often presents a barrier to this. Around 85 per cent of Gypsy and Traveller families in London have been forced to live in housing, or on roadside encampments due to overcrowding, or an unsuitability, or lack of availability of, pitches. The lack of access to secure accommodation and suitable living environments has far-reaching implications for their physical and mental health, welfare, education, employment and access to the wider opportunities London has to offer.

4.16.2 In this Plan, the Mayor has adopted a **new definition** for Gypsies and Travellers. This is due to concerns that the existing Government planning definition does not recognise many Gypsies and Travellers, for example:

- Gypsies and Travellers who have ceased to travel permanently due to; a lack of available permanent pitches, transit sites or stopping places; frequent enforcement action (evictions), or lack of opportunities and barriers to work
- Gypsies and Travellers who live in (bricks and mortar) housing due to

59 http://www.londongypsiesandtravellers.org.uk/why-were-needed/

the lack of sufficient, affordable and good quality caravan site provision; or

- due to their own or their family's or dependants' educational or health needs or old age. This is most likely to affect Gypsies and Travellers who face multiple and intersecting inequalities (for example older people, disabled Gypsies and Travellers, women and single mothers).

4.16.3 For these groups, it is often very difficult or impossible to demonstrate that they would have immediate plans to travel for work in the future (as required by the current **Government planning definition**) because there are no viable options or because doing so would have a significant impact on their health, wellbeing and security of income.

4.16.4 This often results in **Gypsies and Travellers not being recognised or counted in needs assessments**, with many needs assessments identifying zero need. This has a direct impact on the housing options available to Gypsies and Travellers, their ability to retain their cultural status and identity, and can lead to greater inequalities in terms of access to safe and secure accommodation, health care and education.

4.16.5 Insufficient pitch provision can also lead to a rise in **unauthorised encampments**, with implications for the health and wellbeing of Gypsies and Travellers, community cohesion and costs for boroughs.

4.16.6 The new definition should be used within London for the purposes of assessing accommodation need, and auditing and protecting existing sites and pitches.

4.16.7 Boroughs should **actively plan for Gypsies 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.

4.16.8 To assist boroughs in meeting identified need, **Mayoral funding** will be available through the Homes for Londoners 2016-21 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.

4.16.9 If existing pitches 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. The community should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved.

4.16.10 Where **new 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.

Policy H17 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
3) the accommodation is secured for occupation by members of one or more specified higher education institutions
4) at least 35 per cent of the accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance
5) the accommodation provides adequate functional living space and layout.

B Boroughs, student accommodation providers and higher education institutions are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, but away from existing concentrations in central London as part of mixed-use regeneration and redevelopment schemes.

4.17.1 London's higher education institutions 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. Every three student bedrooms in PBSA that are completed equate to meeting the same need that one conventional housing unit meets, and contribute to meeting a borough's housing target (set out in Table 4.1) at the same ratio of three bedrooms being counted as a single home.

4.17.2 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. Meeting the requirement for PBSA should not undermine policy to secure mixed and inclusive neighbourhoods.

4.17.3 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 institutions' estate and expansion plans, availability of appropriate sites, and changes in Government policy that affect their growth and funding. To demonstrate there is a local need for a new PBSA development and ensure the accommodation will be supporting London's higher education institutions, the student accommodation must either be operated directly by a higher education institution or the development must have an undertaking in place from initial occupation, to provide housing for students at one or more specified higher education institutions, for as long as the development is used for student accommodation. A majority of the bedrooms in the development must be covered by such an undertaking. Therefore, the borough should ensure, through condition or legal agreement, that the development will continue to maintain a **nominations agreement** or enter new nomination agreements with one or more specified education institution(s) for a majority of the bedrooms in the development, for as long as it is used as student accommodation or such time period as the borough considers is appropriate. There is no requirement for the higher education institution linked by the agreement to the PBSA to be located within the borough where the development is proposed.

4.17.4 If the accommodation is not secured for use by students and for occupation by members of one or more specified higher educational institutions as set out in paragraph Policy H18 Large-scale purpose-built shared living, it will not be considered as purpose-built student accommodation or meeting a need for purpose-built student accommodation; and the development proposal will be considered **large-scale purpose-built shared living** and be assessed by the requirements of Policy H18 Large-scale purpose-built shared living.

4.17.5 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 D1 London's form and characteristics.

4.17.6 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, a proportion (35 per cent) 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[60]. 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.

4.17.7 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.

4.17.8 **The amount of affordable student accommodation** provided in a development should be 35 per cent of student bedrooms in the development. If 35 per cent affordable student accommodation is not met, a scheme will be considered under the **Viability Tested Route** in line with part E of Policy H6 Threshold approach to applications and the Mayor's Affordable Housing and Viability SPG. The amount of affordable student accommodation provided in a development and its rental costs should be secured and managed through a legal agreement for as long as the development is used for student accommodation.

60 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.

4.17.9 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.

4.17.10 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 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 CIPH[61]. 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.

4.17.11 Where the development is not operated directly by a higher education institution the affordable student accommodation bedrooms should be part of the PBSA that is subject to a nominations agreement. **Allocation** of affordable student accommodation should be by the higher education institution(s) which operates it or has the nomination right to it, and the institution(s) should allocate the rooms to students it considers most in need of the accommodation.

4.17.12 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, interns on university placements, and students on short-term education courses at any institution approved in advance by the borough. 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.

4.17.13 Where a PBSA development meets all the requirements of part A of Policy H17 Purpose-built student accommodation boroughs should not require on-site provision of, or a contribution towards, conventional Use Class C3 affordable housing.

61 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 H18 Large-scale purpose-built shared living

A Large-scale purpose-built shared living Sui Generis use developments, where of good quality and design, may have a role in meeting housing need in London if, at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood, and it meets all the following criteria:

1) it meets an identified need
2) 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
3) it is under single management
4) its units are all for rent with minimum tenancy lengths of no less than three months
5) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and include 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) community management
    g) bedding and linen changing and/or room cleaning services.
6) the private units provide adequate functional living space and layout, and are demonstrably not C3 Use Class accommodation
7) a management plan is provided with the application
8) 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

In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the residential units to be provided at a discount of 50 per cent of the market rent. If a lower contribution is proposed the scheme will be subject to the Viability Tested Route set out in part E of Policy H6 Threshold approach to applications.

4.18.1 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.

4.18.2 Development proposals for such schemes should only be supported where they meet an **identified market need**.

4.18.3 To qualify as **large-scale purpose-built shared living**, the development, or block or phase within a development must be 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. To ensure this form of accommodation is meeting its specific housing need, it is important that it does not effectively become a hostel, so tenancies should be for a minimum of three months.

4.18.4 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 rooms will be cleaned and how linen changing services will operate
e. how deliveries for servicing the development and residents' deliveries will be managed

f. on-site staff and their responsibilities

g. with reference to the on-site staff, what internal community events will take place and how the surrounding community will be engaged.

4.18.5 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
- an on-site community manager should help to organise events to encourage social interaction between residents.

4.18.6 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 kitchenettes. There are currently no minimum space standards for these units. Given the generally small size of the private space in these developments, the communal amenity spaces are important elements in ensuring 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.

4.18.7 This form of accommodation is required to **contribute to affordable housing**. However, because it does not meet minimum housing space standards and generally consists of bedrooms rather than housing units, 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.

4.18.8 A borough can decide whether it would prefer the financial contribution as a single upfront payment for affordable housing (part A8a of Policy H18 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[62], or an ongoing in perpetuity payment linked to actual rental income (part A8b of Policy H18 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. If these **affordable housing contribution requirements** are not met, the scheme will be considered under the Viability Tested Route in line with part E of Policy H6 Threshold approach to applications and the Mayor's Affordable Housing and Viability SPG.

4.18.9 The **rental cost** of this form of accommodation is not directly comparable to the rental costs of conventional Use Class C3 housing as units are significantly smaller than the minimum housing space standard i.e. a one person dwelling of 37 sqm. If a comparison is undertaken it should be on a square metre rental rate of the private accommodation and not a unit rental rate.

62 Evidence of the market value of the shared living units will need to be provided under the Fast Track Route to enable the upfront payment to be calculated.

Chapter 5

Social Infrastructure



Policy S1 Developing London's social infrastructure

A Boroughs, in their Development Plans, should undertake a needs assessment of social infrastructure to meet the needs of London's diverse communities.

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.

F Development proposals that would result in a loss of social infrastructure in an area of defined need should be refused unless:

1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood, or;

2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities in order 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.

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, recreation, sports, faith, and emergency facilities**. 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 Local green and 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 the Community Infrastructure Levy. Supplementary Planning Guidance will provide details of how this could be approached.

5.1.4 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. 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.

5.1.5 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 to meet other community needs, before alternative uses are pursued.

5.1.6 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 S2 Health and social care facilities and any related information or guidance in order to achieve the overall aims of the programme and to continue to meet the needs of Londoners.

5.1.7 In all cases, where housing is considered to be an appropriate alternative use, opportunities for **affordable housing provision** should be maximised.

5.1.8 Social infrastructure should be easily accessible by walking, cycling and public transport in accordance with the Healthy Streets Approach. It is also important to consider the way that social infrastructure integrates with other facilities and the way people who live or work in the area might want to access it. **Shared use and co-location of facilities** should be encouraged, in order 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 also help facilities and service providers to work in a more coherent and joined-up way, and share maintenance and management costs. It could also potentially 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.

5.1.9 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 in order to maximise health and care outcomes
3) regularly assess the need for health and social care facilities 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

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 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[63] people working in the NHS in London. Several factors 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.

5.2.2 The NHS Five Year Forward View identifies the need to **prevent avoidable illness** and **transform the way that care is organised and delivered** in order to meet increasing demands for healthcare within the resources available. It describes the following priorities:

- supporting and enabling individuals to take better care of their own health and the health of their families and communities
- undertaking a higher proportion of healthcare in community rather than hospital settings
- 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.

63 http://content.digital.nhs.uk/catalogue/PUB23046/nhs-work-stat-oct-2016-pdf.pdf

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.

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.

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[64] supports 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. 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.

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 of the growth. Joint Strategic Needs Assessments produced by local Health and Wellbeing Boards describe the current and future health and wellbeing

64 https://www.england.nhs.uk/wp-content/uploads/2016/04/gpfv.pdf

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.

5.2.7 Where population growth and change is taking place at fairly 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) identify and address local needs and any shortages in supply, both locally and sub-regionally, including cross-boundary issues
2) identify sites for future provision through the Local Plan process, particularly in areas with significant planned growth and/or need
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 encourage walking and cycling
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
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
10) ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

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 71,000 **childcare places** are needed between 2016 - 2041[65]. 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 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 demand for an additional 60,000-67,000 primary school places and 105,000-122,000 secondary school places in state maintained schools up

65 Childcare Demand Projections (2017) GLA Intelligence Unit

to 2025[66]. This demand, 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. 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 D3 Inclusive design).

5.3.7 The **London Schools Atlas**[67] 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-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

66 Projected Demand for School Places (2015) GLA Intelligence Unit

67 https://maps.london.gov.uk/schools/

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 well-connected by 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. All children should be able to travel to school by walking, cycling or public transport. 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 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[68]. 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.

68 Education Funding Agency (2015) Notes on area guidelines for mainstream schools: BB103 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) undertake audits of existing play and informal recreation provision and opportunities, and assessments of need, considering the quantity, quality and accessibility of provision
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, of at least 10 square metres 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.
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.

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 opportunities for play, and being able to be independently

mobile within their neighbourhood, is important for children and young people's wellbeing and development.

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 Where **formal play provision** is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating. 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 in accordance with Development Plans' play policies for the area, using a benchmark of 10 square metres per child as a basis for assessing future requirements arising from a projected increase in the child population of the area. 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.

Policy S5 Sports and recreation facilities

A In order to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:

1) regularly assess the need for sports and recreation facilities at the local and sub-regional level
2) secure sites for a range of sports and recreation facilities
3) maintain and promote the Walk London Network shown on Figure 5.1 and encourage networks for walking, cycling and other activities.

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 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
4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand.

C Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space (Policy G3 Metropolitan Open Land) 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[69]. 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.

69 Strategic Assessment of Need: Swimming Pools, Sports Halls and Artificial Grass Pitch provision in London 2017-2041 Facilities Planning Model. Sport England. July 2017

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.

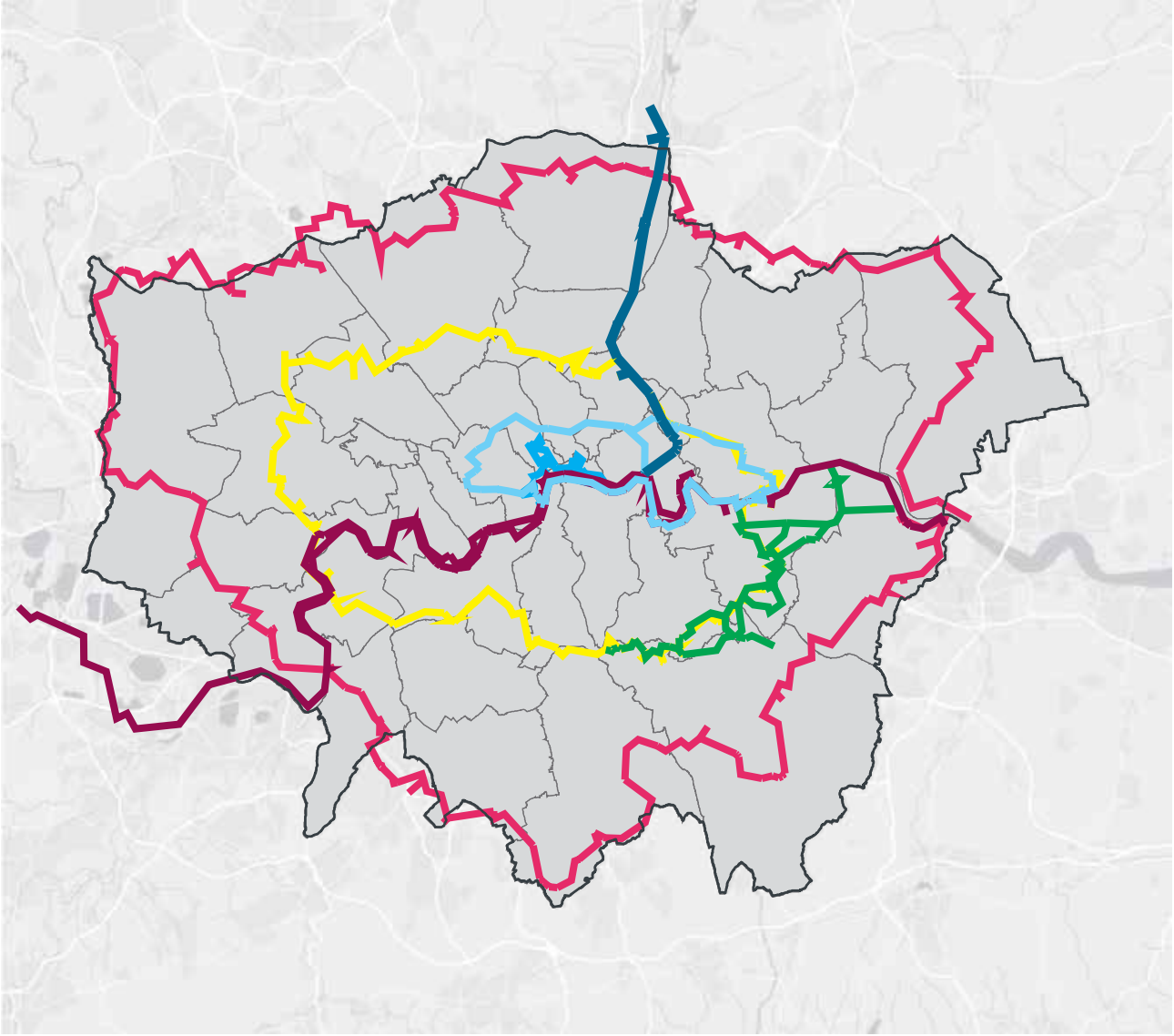
5.5.5 **Specialist sporting venues and stadiums** also have a role to play in providing facilities and enabling wider access to sport, as well as having an important cultural value.

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 to not 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.

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)

Policy S6 Public toilets

A Development proposals that include large-scale commercial developments that are open to the public, such as shops, leisure facilities and large areas of public realm, should provide and secure the future management of free publicly-accessible toilets. These should be available during opening hours, or 24 hours a day in areas of public realm, and should be suitable for a range of users including disabled people and families with young children.

B Larger developments where users are expected to spend long periods of time or where there is no other local provision, should also provide 'Changing Places' toilets as identified in the British Standard BS8300.

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 commercial developments** that are open to the public. Boroughs should define 'large-scale' for their local circumstances.

5.6.3 Taking into account the needs of all Londoners, **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. Consideration should also be given to the provision of gender-neutral toilets.

5.6.4 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.

5.6.5 Public toilet facilities, whether provided inside buildings or externally, should be safe 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.

5.6.6 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.

5.6.7 **Further guidance** on the types of development where it would be appropriate to provide a Changing Places toilet can be found in British Standard BS8300. 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 Cemeteries should be protected and the re-use of burial space supported.

B 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. 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.

C Development proposals for new cemetery provision should be supported. This may include provision in one borough to assist faith groups from another borough facing burial space shortages.

5.7.1 In assessing the requirements for burial space, account should be taken 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[70]. For inner and central 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. The Mayor favours the principle of proximity as a general rule, but 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 approach to the provision of burial space.

5.7.2 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.

5.7.3 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. Provision of facilities for cemeteries may not be inappropriate development in the **Green Belt or on Metropolitan Open Land** as long as it preserves the openness and does not conflict with the purposes of including land within it.

5.7.4 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. Woodland or parkland burial grounds can offer broad burial provision as well as wider public access. Amenity provision and environmental enhancements should be encouraged.

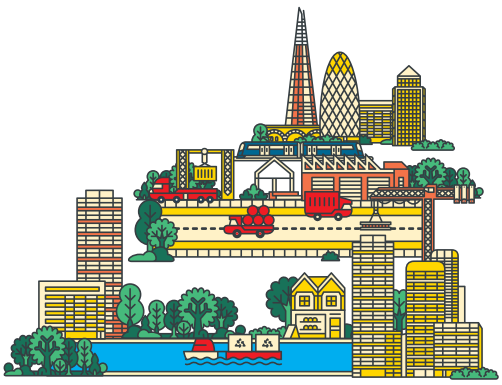
5.7.5 Boroughs should continue to make traditional burial provision but **innovative approaches** to the provision of community burial space, particularly in inner and central London, may also need to be taken. These

70 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

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



Policy E1 Offices

A Improvements to the competitiveness and quality 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, where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking into account projected demand for office-based employment and office floorspace to 2041 in Table 6.1.

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) (see Policy SD4 The Central Activities Zone (CAZ) and Policy SD5 Offices, other strategic functions and residential development in the CAZ) and other nationally-significant office locations (such as Tech City, Kensington & Chelsea and the Royal Docks Enterprise Zones), 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 CAZ and NIOD) 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 (see Town Centre Network office guidelines in Figure A1.4)
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 outer and inner London locations outside the CAZ and NIOD 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 (see Policy SD9 Town centres: Local partnerships and implementation and office guidelines in Figure A1.4).

F Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ, NIOD, Tech City, the Royal Docks Enterprise Zones, 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 D.3 above) are not undermined by office to residential permitted development rights.

G Development proposals should:

1) take into account the need for lower cost and affordable workspace (see Policy E2 Low-cost business space and Policy E3 Affordable workspace)
2) examine the scope for the re-use of otherwise surplus large office spaces for smaller units
3) support the redevelopment, intensification and change of use of surplus office space to other uses including housing.

6.1.1 London has a **diverse range of office markets** 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[71]. Office employment projections suggest an increase of 619,300 jobs, from 1.98

[71] Ramidus Consulting. London Office Policy Review. GLA, 2017. URS, Ramidus, #1Seed and Gort Scott, Supporting places of work: incubators, accelerators, co-working spaces, GLA, 2014

million in 2016 to 2.60 million in 2041, a rise of 31 per cent[72]. This could translate into demand for between 4.7 and 6.1 million sqm 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.

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 sqm)
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[73] complemented by Tech City and Kensington & Chelsea with Stratford and Old Oak Common 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.

72 Ramidus Consulting 2017 op cit

73 CAG Consulting. London Employment Sites Database, GLA, 2017 and Ramidus 2017 op cit.

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.

6.1.6 Outside the office to residential permitted development rights (PDR) exemption areas, more than 1.6 million sqm of office space had received prior approval to change to residential by March 2016[74] 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 (see Policy SD2 Collaboration in the Wider South East) and for geographically-defined parts of other existing and viable strategic and local office clusters, to ensure that their office functions are not undermined by office to residential PDR.

Policy E2 Low-cost business space

A The provision, and where appropriate, protection of a range of low-cost B1 business space should be supported to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.

B Development proposals that involve the loss of existing B1 space (including creative and artist studio space) in areas where there is an identified shortage of lower-cost space should:

1) demonstrate that there is no reasonable prospect of the site being used for business purposes, or

74 Source: London Development Database

2) ensure that an equivalent amount of B1 space is re-provided in the proposal (which is appropriate in terms of type, specification, use and size), incorporating existing businesses where possible, or

3) demonstrate that suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and, where existing businesses are affected, that they are subject to relocation support arrangements before the commencement of new development.

C Development proposals for new B1 business floorspace greater than 2,500 sqm (gross external area) should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises.

6.2.1 Smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. To deliver 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. Ensuring a **sufficient supply of business space** of different types and sizes will help to ensure that workspace is available for occupation at an appropriate range of rents reflecting the specification, quality and location of the space.

6.2.2 **Low-cost business space** refers to secondary and tertiary space, which is of a lower specification than prime space[75]. It is often found in locations such as back-of town centre and 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.

6.2.3 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[76]. This policy is intended to operate in those parts of London where there are particular cost pressures and a shortage of lower-cost secondary or tertiary space available for occupation. It will be most effective in those parts of London where boroughs have removed office or

75 See Glossary for definitions of prime, secondary and tertiary commercial property

76 Ramidus Consulting 2017 op cit / London Development Database monitoring

light industrial to residential permitted development rights through Article 4 Directions.

6.2.4 Where there is demand for workspace or viable existing business uses on site, development proposals for alternative uses should deliver an equivalent amount of workspace through the **intensification or reconfiguration of space**. Part B.3 of the policy applies in exceptional circumstances, where it can be demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site through intensification or reconfiguration. What constitutes a reasonable proximity should be determined on the circumstances of each case having regard to the impact on business supply chains and access to labour supply. Relocation arrangements should be put in place prior to the commencement of development to ensure that disruption to existing businesses is minimised.

6.2.5 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 and co-working space[77]. What constitutes a reasonable proportion of workspace suitable for SMEs should be determined on the circumstances of each case.

6.2.6 If business space is demonstrated to be obsolete or surplus to requirements, it should be **redeveloped for housing and other uses**. Evidence to assess the reasonable prospect of workspace being used for business purposes should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (for at least 12 months at market rates suitable for the type, specification, use and size). This evidence should be used to inform viability assessments.

77 Ramidus Consulting 2017 op cit section 2.3

Policy E3 Affordable workspace

A In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is:

1) dedicated for specific sectors that have social value such as charities or social enterprises
2) dedicated for specific sectors that have cultural value such as artists' studios and designer-maker spaces
3) dedicated for disadvantaged groups starting up in any sector
4) providing educational outcomes through connections to schools, colleges or higher education
5) supporting start-up businesses or regeneration.

B Particular consideration should be given to the need for affordable workspace for the purposes in part A above:

1) where there is existing affordable workspace on-site
2) in areas where cost pressures could lead to the loss of affordable 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 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, are encouraged to consider more 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 Section 106 agreements should include ways of monitoring that the objectives in part A above are being met, including evidence that they 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 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.

F The affordable workspace elements of a mixed-use scheme should be operational prior to residential elements being occupied.

6.3.1 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 directly by a public, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured permanently by planning or other agreements.

6.3.2 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.

6.3.3 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' studios, designer-maker spaces and charities or 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.

6.3.4 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 business space 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 maintained. This should make provision for:

1) light and general industrial uses
2) storage and logistics/distribution including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points
3) secondary materials and waste management
4) utilities infrastructure
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 Low-cost business space) taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

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[78] - see below.

C The retention and provision of industrial capacity across the three categories of industrial land set out in part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. 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 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function.

D The retention 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
4) are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision.

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.

78 Sites containing industrial and related functions that are not formally designated as SIL or LSIS in a Local Plan

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.

H Development proposals for large-scale (greater than 2,500 sqm GIA) industrial floorspace should consider the scope to provide smaller industrial units suitable for SMEs, in particular where there is a local shortage and demand for such space.

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 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[79].

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 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[80] 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 **transferred**

79 SEGRO, Keep London Working, 2017; Turley. Industrial Revolution, 2017

80 AECOM. London Industrial Land Supply and Economy Study, GLA, 2016

to other uses. This was well in excess of previously established London Plan monitoring benchmarks[81]. Research for the GLA indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041[82], 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 retain sufficient industrial, logistics and related capacity by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS. 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[83] (whichever is the greater). The **principle of no net loss** of floorspace capacity does not apply to sites previously used for utilities infrastructure or land for transport functions which are no longer required.

6.4.6 Guidance on the approach to be taken to the management of industrial floorspace capacity at borough level and across industrial property market areas is provided in Figure 6.1 and Table 6.2. Boroughs in the **'Provide Capacity' category** are those where strategic demand for industrial, logistics and related uses is anticipated to be the strongest[84]. They should seek to deliver intensified floorspace capacity in either existing and/or new locations accessible to the strategic road network and in locations with potential for transport of goods by rail and/or water.

6.4.7 Boroughs in the **'Retain' category** should seek to intensify industrial floorspace capacity following the general principle of no net loss across designated SIL and LSIS. All boroughs in the Central Services Area

81 AECOM 2016 op cit

82 CAG Consulting, London Industrial Land Demand Study, GLA 2017

83 Source: London Employment Sites Database, GLA Economics, 2017: 65 per cent is the default plot ratio assumption for industrial and warehousing sites

84 CAG Consulting, 2017 op cit

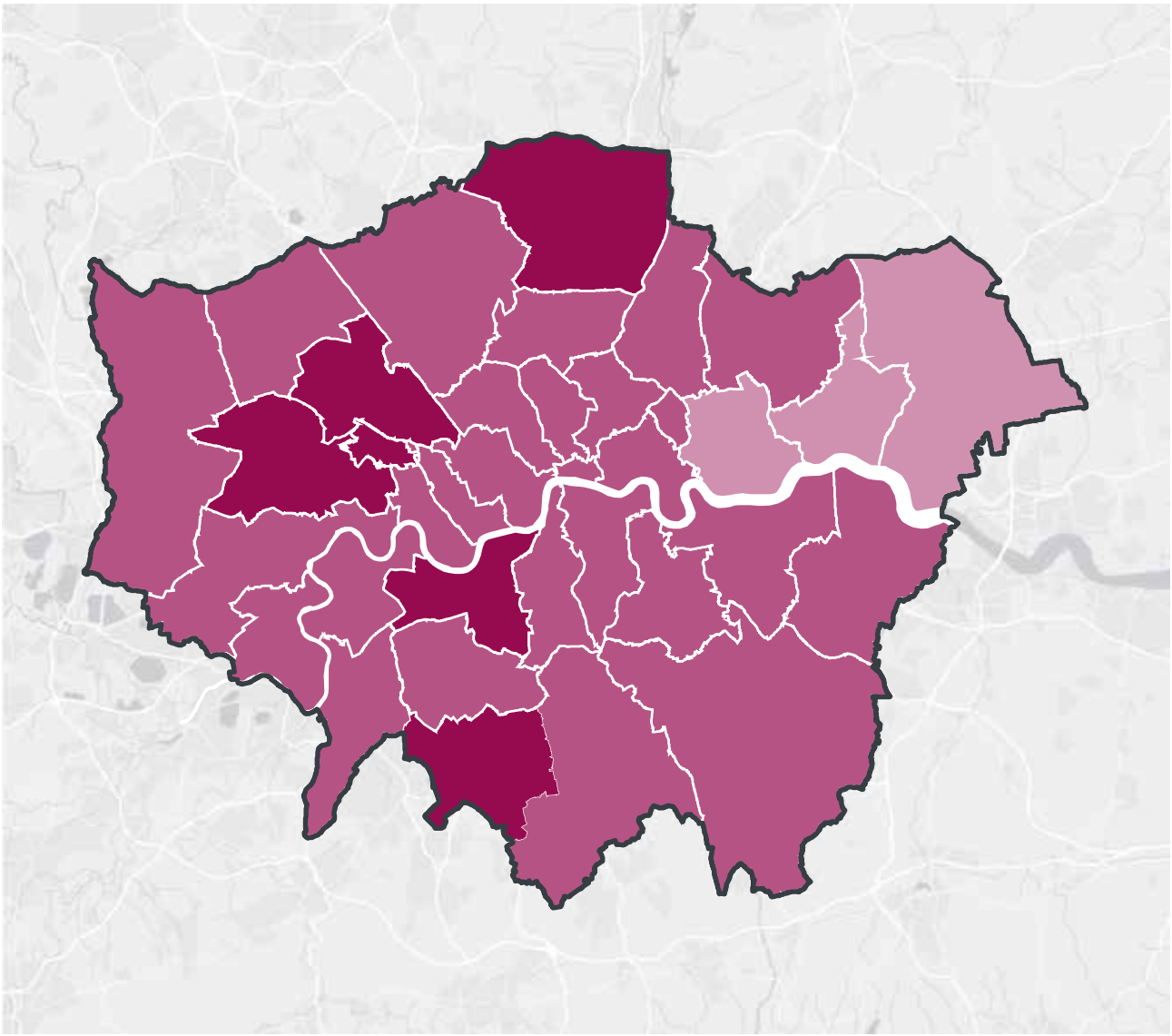
fall within this category in recognition of the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions.

6.4.8 There are three boroughs in the **'Limited Release' category** (all in the Thames Gateway) where industrial land vacancy rates are currently well above the London average. There is scope in these selected boroughs for limited release of industrial land in SIL and/or LSIS through a plan-led approach to reduce these vacancy rates and support the re-use of surplus land and floorspace for other uses.

Table 6.2 - Management of industrial floorspace capacity - industrial property market area and borough-level categorisations

Property Market Area / Borough	Categorisation
Central Services Area	
Camden	Retain capacity
City of London	Retain capacity
Hackney	Retain capacity
Islington	Retain capacity
Kensington & Chelsea	Retain capacity
Lambeth	Retain capacity
Lewisham	Retain capacity
LLDC	Retain capacity
Southwark	Retain capacity
Tower Hamlets	Retain capacity
Westminster	Retain capacity
Thames Gateway	
Barking & Dagenham	Limited release
Bexley	Retain capacity
Bromley	Retain capacity
Greenwich	Retain capacity
Havering	Limited release
Newham	Limited release
Redbridge	Retain capacity
Lee Valley	
Enfield	Provide capacity
Haringey	Retain capacity
Waltham Forest	Retain capacity
Park Royal/Heathrow	
Barnet	Retain capacity
Brent	Provide capacity
Ealing	Provide capacity
Hammersmith & Fulham	Retain capacity
Harrow	Retain capacity
Hillingdon	Retain capacity
Hounslow	Retain capacity
OPDC	Provide capacity
Richmond	Retain capacity
Wandle Valley	
Croydon	Retain capacity
Kingston	Retain capacity
Merton	Retain capacity
Sutton	Provide capacity
Wandsworth	Provide capacity

Figure 6.1 - Management of industrial floorspace capacity - borough level categorisations



Management of Industrial Floorspace Capacity
Borough Level Categorisations

- Provide Capacity
- Retain Capacity
- Limited Release

Source: GLA Planning

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Policy E5 Strategic Industrial Locations (SIL)

A Strategic Industrial Locations (identified in Figure 6.2 and Table 6.3) should be managed proactively through a plan-led process to sustain them as London's main reservoirs 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 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function), and use the adopted Local Plan SIL boundary as the basis for decision-making

2) develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including access improvements and digital connectivity) for the functions set out in part C

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 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

C Development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities set out below:

1) light industrial (Use Class B1c)

2) general industrial uses (Use Class B2)

3) storage and logistics/distribution uses (Use Class B8)

4) other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets

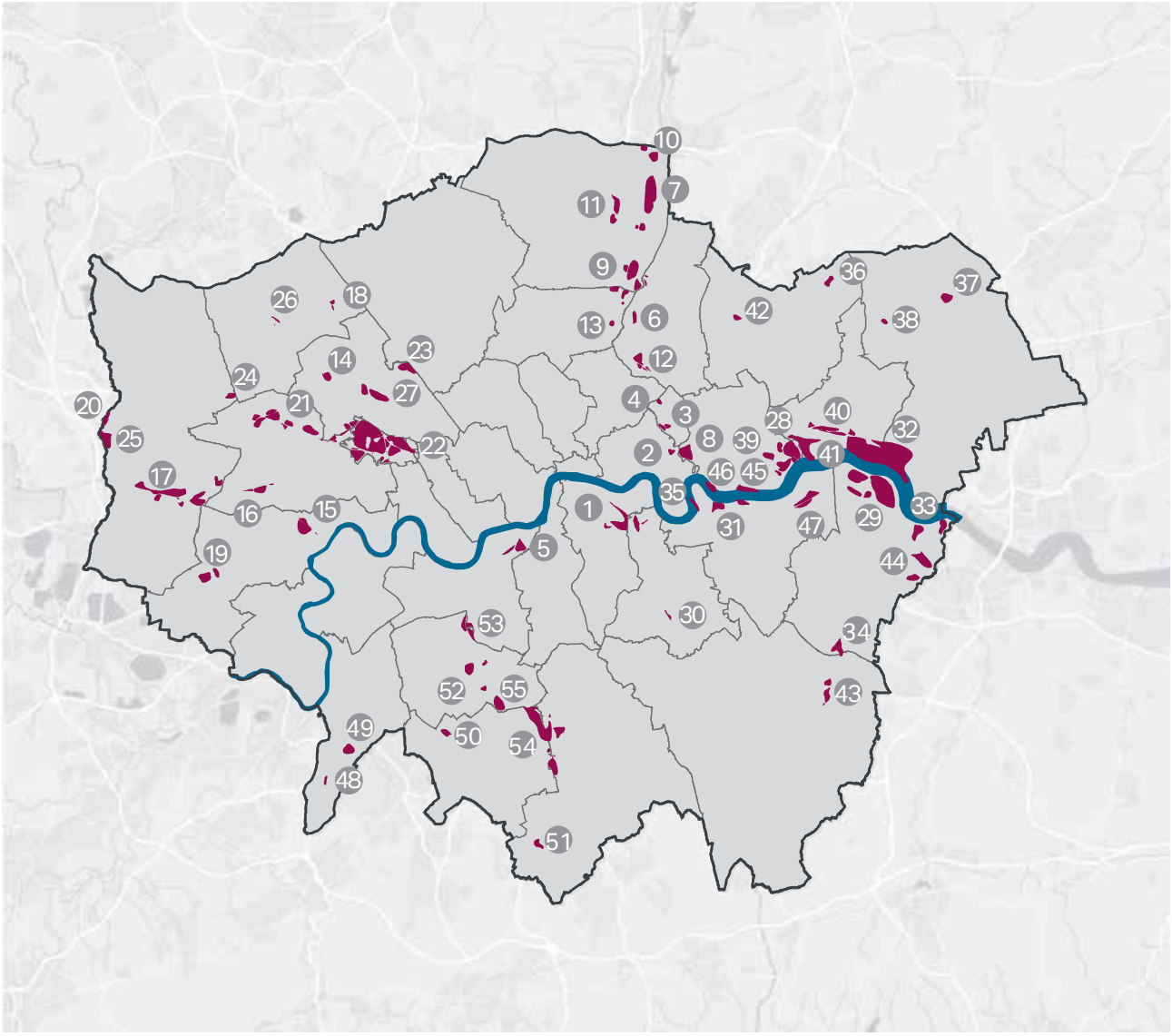
5) flexible B1c/B2/B8 premises suitable for occupation by SMEs

6) small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés.

D Development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.

E 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. In line with Agent of Change principles (Policy D12 Agent of Change) residential development adjacent to SILs should be designed to ensure that the industrial activities 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.

Figure 6.2 - Strategic Industrial Locations



Strategic Industrial Locations

● Strategic Industrial Locations (SIL)

References refer to Table 6.3

Source: GLA Planning

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Table 6.3 - 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

Ref.	Location	Industrial Property Market Area	Planning Authority
22	Park Royal	Park Royal / Heathrow	OPDC (Brent / Ealing / Hammersmith & Fulham)
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

Ref.	Location	Industrial Property Market Area	Planning Authority
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
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

6.5.1 London's SILs, listed in Table 6.3 and illustrated in Figure 6.2, 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 and 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 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function). 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.

Policy E6 Locally Significant Industrial Sites

A In their Development Plans, boroughs should:

1) 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 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function)

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 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

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) development of mezzanines
2) introduction of small units
3) development of multi-storey schemes
4) addition of basements
5) more efficient use of land through higher plot ratios having regard to operational 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 SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL 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 E below and ensure that it does not undermine or compromise the integrity or effectiveness of the SIL in accommodating the industrial-type activities identified in part C of Policy E5 Strategic Industrial Locations (SIL). This approach should only be considered as part of a plan-led process of SIL 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.

C Development Plans and planning frameworks should be proactive and consider whether certain logistics, industrial and related functions in selected parts of LSIS could be intensified and/or co-located with residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process should meet the criteria set out in part E below. This approach should only be considered as part of a plan-led process of LSIS intensification and consolidation (and 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.

D Mixed-use or residential development proposals on Non-Designated Industrial Sites will 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 a Development Plan for residential or mixed-use development on the basis of part D.1; or
3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification where this is feasible; or
4) suitable alternative accommodation (in terms of type, specification, use and size) is available in reasonable proximity to the development proposal and subject to relocation support arrangements for existing businesses before the commencement of new development.

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 parts E.2 to E.4 below.

E The processes set out in Parts B, C and D above must ensure that:

1) the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing
2) 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

3) the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied

4) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:

   a) safety and security (see Policy D10 Safety, security and resilience to emergency and Policy D11 Fire safety)

   b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict (see Policy T4 Assessing and mitigating transport impacts)

   c) design quality, public realm, visual impact and amenity for residents (see Policy D1 London's form and characteristics, Policy D2 Delivering good design, Policy D3 Inclusive design, Policy D4 Housing quality and standards, Policy D5 Accessible housing, Policy D6 Optimising housing density, Policy D7 Public realm and Policy D8 Tall buildings)

   d) vibration and noise (see Policy D13 Noise)

   e) air quality, including dust, odour and emissions (see Policy SI1 Improving air quality and Policy SI2 Minimising greenhouse gas emissions).

F Development Plans and planning frameworks should consider, in collaboration with 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, boroughs are encouraged to explore the potential to **intensify industrial activities**[85] on industrial land and consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential. 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)[86].

6.7.2 Whilst the majority of land in SILs should be retained and intensified for the industrial-type functions set out in part C of Policy E5 Strategic Industrial Locations (SIL), there may be scope for selected parts of SILs or LSISs to be consolidated. This should be done through a carefully co-ordinated plan-led approach (in accordance with parts B, C and E of Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function) to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the **transfer of some land** for a mix of uses including residential. Local Plan policies' maps and/or OAPFs should indicate clearly: (i) the area to be retained and 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 removed from SIL or LSIS (see illustrative examples in Figure 6.3). To ensure that such development works effectively, there should be a development agreement in place between a residential and industrial developer to support this process. In order to follow the Fast Track Route (see Policy H4 Meanwhile use), industrial sites will need to meet the 50 per cent threshold for affordable housing.

85 Industrial Intensification Primer, GLA 2017; CAG Consulting, 2017 op cit

86 CAG Consulting, 2017 op cit. Mayor of London. Land for Industry and Transport SPG, GLA, 2012

6.7.3 Outside of areas designated as SIL or LSIS there may be opportunities to deliver a **mix of industrial and residential on the same site** either side-by-side or through vertical stacking. Mixed-use and residential development proposals on existing Non-Designated Industrial Sites should ensure either that there is no reasonable prospect of the site being used for logistics/ industrial purposes, or incorporate light/general industrial or storage/distribution uses or put in place suitable relocation arrangements for any businesses/operations affected.

6.7.4 Evidence to demonstrate '**no reasonable prospect'** should include:

- strategic and local assessments of demand
- the site should have been marketed with appropriate lease terms, 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.

6.7.5 There is a significant amount of industrial and logistics capacity serving London that is located outside of the capital[87]. There may be scope for some **substitution**[88] 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[89].

6.7.6 **Collaborative working** between the Mayor, boroughs and other stakeholders on Development Plan reviews, planning frameworks and masterplans provide 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 delivery of strategic infrastructure, housing, social infrastructure and other uses.

87 AECOM 2016 op cit

88 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.

89 CAG Consulting, 2017 op cit. Peter Brett Associates. Industrial Land and Transport Study, TfL, 2017

Figure 6.3 - Simplified illustrations of approaches to SIL/LSIS consolidation



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 institutions and other relevant research and innovation organisations should be encouraged.

E London's higher and further education institutions 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.

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
- **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 - reducing waste, and improving resource recovery and reuse. 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 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 SI6 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 institutions 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 institutions 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.

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, Policy SD7 Town centre network, Policy SD8 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) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres
4) 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
5) 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

6) 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 SD8 Town centres: development principles and Development Plan Documents

7) support the range of London's markets, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to the vitality of town centres and the Central Activities Zone

8) 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, Policy SD7 Town centre network, Policy SD8 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

9) 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.

C Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance 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 consider whether it is appropriate to manage an over-concentration of A5 hot food takeaway uses within Local, District and other town centres through the use of locally-defined thresholds in Development Plans.

D Where development proposals involving A5 hot food takeaway uses are permitted, these should be conditioned to require the operator to achieve,

and operate in compliance with, the Healthier Catering Commitment standard.

E Large-scale commercial development proposals (containing over 2,500 sqm gross A Class floorspace) should support the provision of small shops and other commercial units (including affordable units where there is evidence of local need).

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 SD8 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 a period of continued 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 sqm over the period 2016-2041, or 1.2 million sqm when current schemes in the planning pipeline are taken into account[90].

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 and Policy SD6 Town centres, Policy SD7 Town centre network, Policy SD8

90 Experian, 2017 op cit.

Town centres: development principles and Development Plan Documents and Policy E9 Retail, markets and hot food takeaways.

6.9.4 **Street markets** in London can play a valuable economic, social and cultural role[91] 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 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. 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 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 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, particularly in town centres that are within Strategic Areas for Regeneration (see Table A1.1), which tend to have higher numbers of these premises[92].

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[93]. The creation of a **healthy food environment**, including access to fresh food, is therefore important. The number of

91 GLA Street Markets research – Understanding London's Markets

92 London Town Centre Health Check, GLA 2017

93 From Evidence into Action: Opportunities to Protect and Improve the Nation's Health. Public Health England, Oct. 2014. https://www.gov.uk/government/publications/from-evidence-into-action-opportunities-to-protect-and-improve-thenations-health

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[94].

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. 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.

6.9.8 The **Healthier Catering Commitment**[95] 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 should support the diversity, vitality and vibrancy of town centres by providing a range of unit sizes that include smaller premises. Where there is local evidence of need, such developments should also include affordable units (secured through planning conditions or planning obligations as appropriate).

94 Public Health England (2016) Fast Food Map https://www.noo.org.uk/securefiles/161024_1252//FastFoodmap_FINAL.pdf

95 http://www.cieh.org/healthier-catering-commitment.html

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 the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted.

C A sufficient supply of serviced accommodation for business visitors should be maintained, and the provision of high-quality convention facilities in town centres and in and around the CAZ should be supported.

D Within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in the commercial core parts of the CAZ (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), subject to the impact on strategic office space. Intensification of the provision of serviced accommodation in areas of existing concentration should be resisted, except where this will not compromise local amenity or the balance of local land uses.

E In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas where they are well-connected by public transport, particularly to central London.

F The role of apart-hotels and short-term lettings should be supported whilst ensuring that they do not compromise housing provision (see Policy H11 Ensuring the best use of stock).

G 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; OR

2) 15 per cent of new bedrooms to be accessible rooms in accordance with the following requirements:

a) one room or five per cent, whichever is the greater, with a wheelchair-accessible shower room for independent use

b) a further one room or one per cent, whichever is the greater, with a fixed tracked-hoist system or similar system with the same degree of convenience and safety as an en-suite bathroom for assisted use, and a connecting door to an adjoining (standard) bedroom for use by an assistant or companion

c) one room or five per cent, whichever is the greater with an en-suite shower room to meet the requirements of ambulant disabled people

d) four per cent of bedrooms easily adaptable and large enough for easy adaptation to be wheelchair-accessible (with en-suite) if required in the future, and incorporate all the correct dimensions and sanitary layouts and be structurally capable of having grab-rails installed quickly and easily if required.

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, 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[96].

6.10.3 **Boroughs in the CAZ** are encouraged to direct strategically-significant serviced accommodation (defined as more than 20,000 sqm in the CAZ) towards the CAZ Opportunity Areas with smaller-scale provision in other commercial core areas of the CAZ. Concentrations of serviced accommodation within parts of the CAZ that might constrain other

96 GLA Economics. Working Paper 88. Projections of demand and supply for visitor accommodation in London to 2050. GLA, 2017

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 **Alternative forms of accommodation** such as short-term lets have supplemented the supply of serviced accommodation and provided greater choice for visitors. However, it is important that short-term let provision does not compromise the supply of conventional housing and that the impact such provision can have on traditionally residential areas is addressed. The use of student halls as visitor accommodation during university vacation periods can help meet seasonal fluctuations in demand. It is important that this is in appropriate locations and does not disrupt the daily lives of resident students and their academic calendar.

6.10.5 Improving the availability of **accessible serviced accommodation**[97] 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 (also see Policy D3 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 for not only 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.

Policy E11 Skills and opportunities for all

A The Mayor will work with strategic partners to address low pay and, supported by his Skills for Londoners Taskforce, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.

97 Projections of demand and supply for accessible hotel rooms in London, GLA Economics 2017.

B Development proposals should seek to 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 (a) enable trainees to complete their training and apprenticeships, (b) ensure the greatest level of take-up possible by Londoners of the training, apprenticeship and employment opportunities created and (c) 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



Policy HC1 Heritage conservation and growth

A Boroughs should, in consultation with Historic England and other relevant statutory 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 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 sustain 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 seek to 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

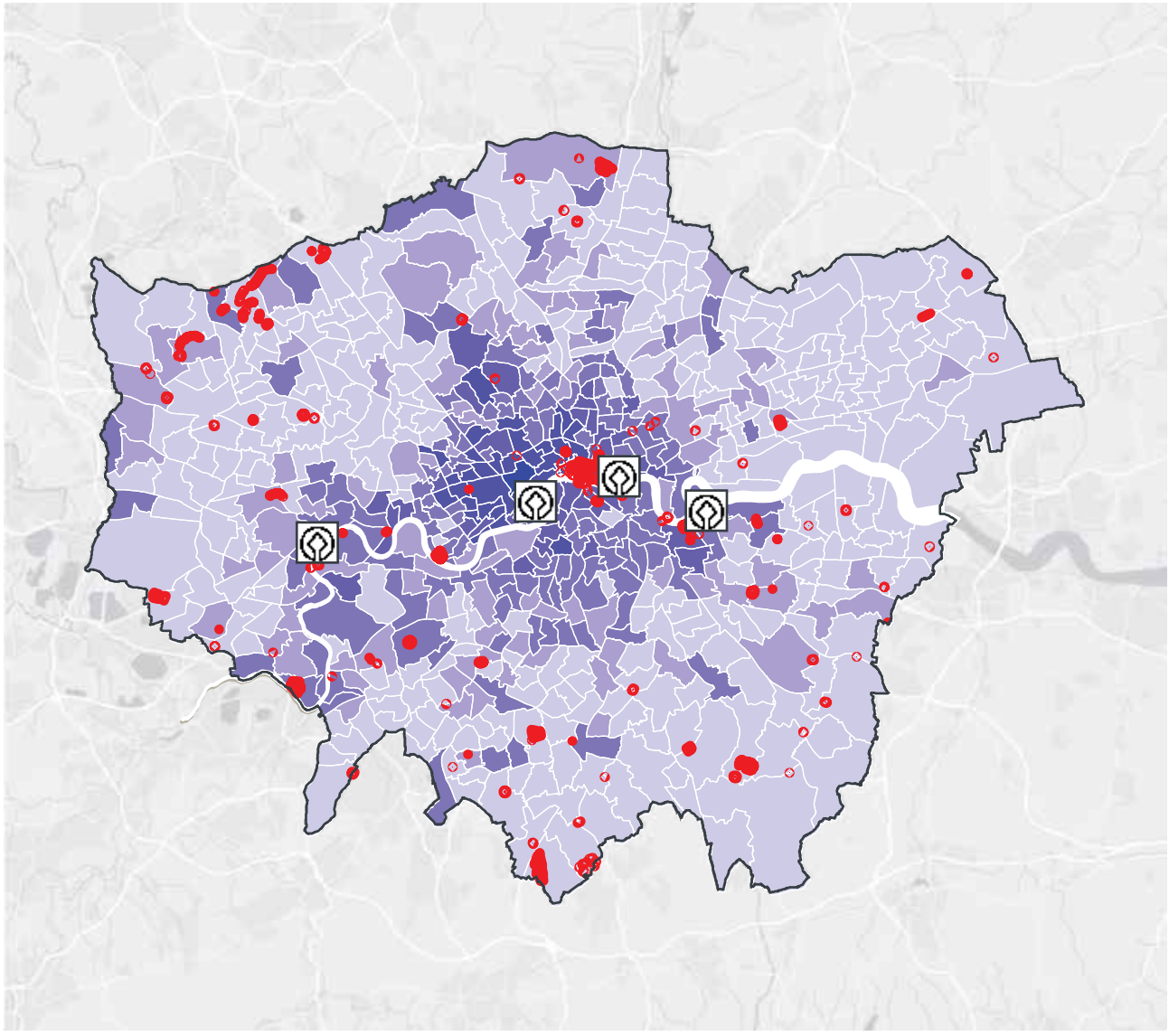
archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

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.

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 and ancient woodlands. The distribution of designated assets differs across different parts of London, and is shown in Figure 7.1, Figure 7.2, Figure 7.3, Figure 7.4 and Figure 7.5. 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

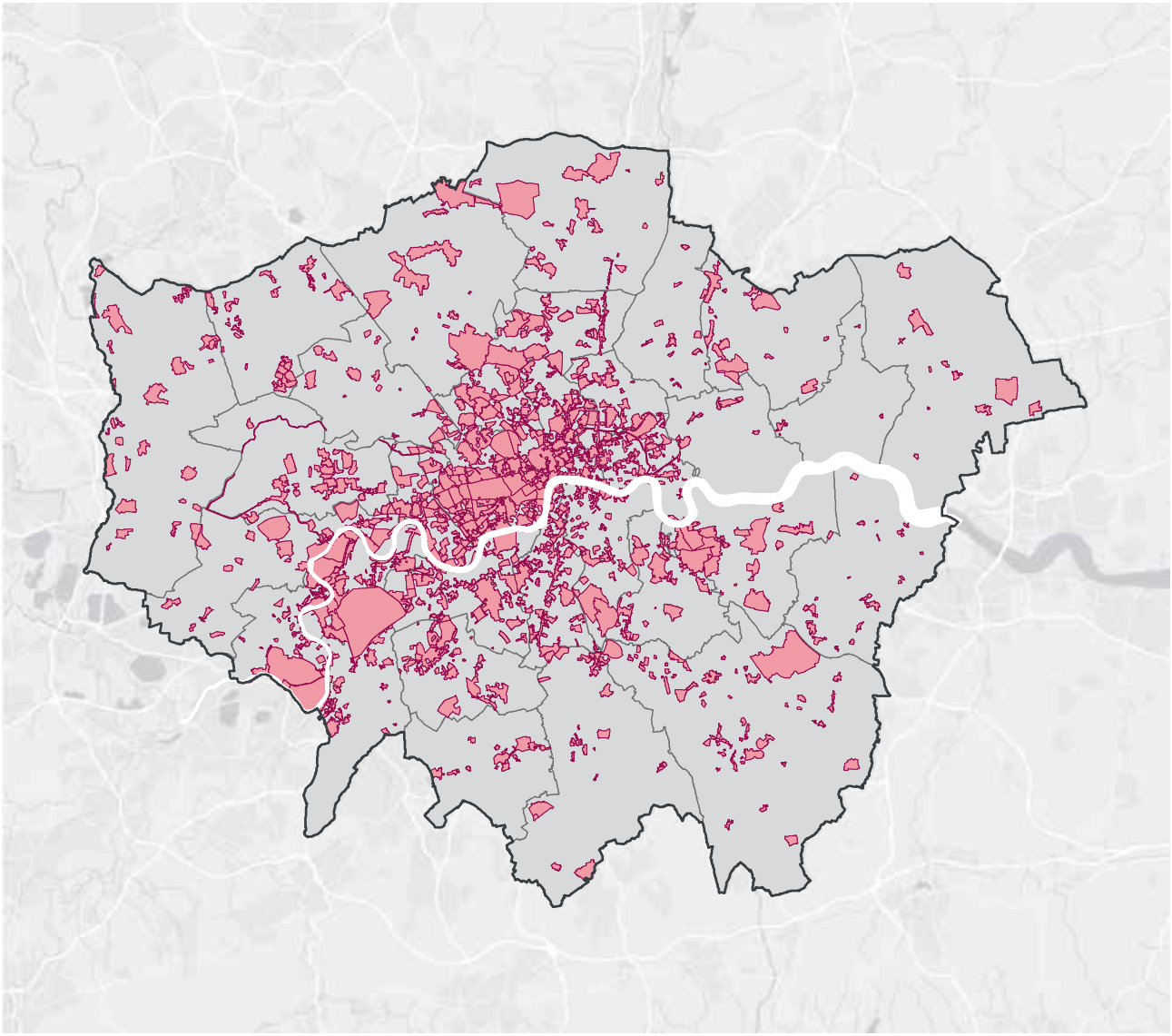
Scheduled Monuments

UNESCO World Heritage Sites from left to right; Royal Botanical Gardens, Kew; Palace of 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

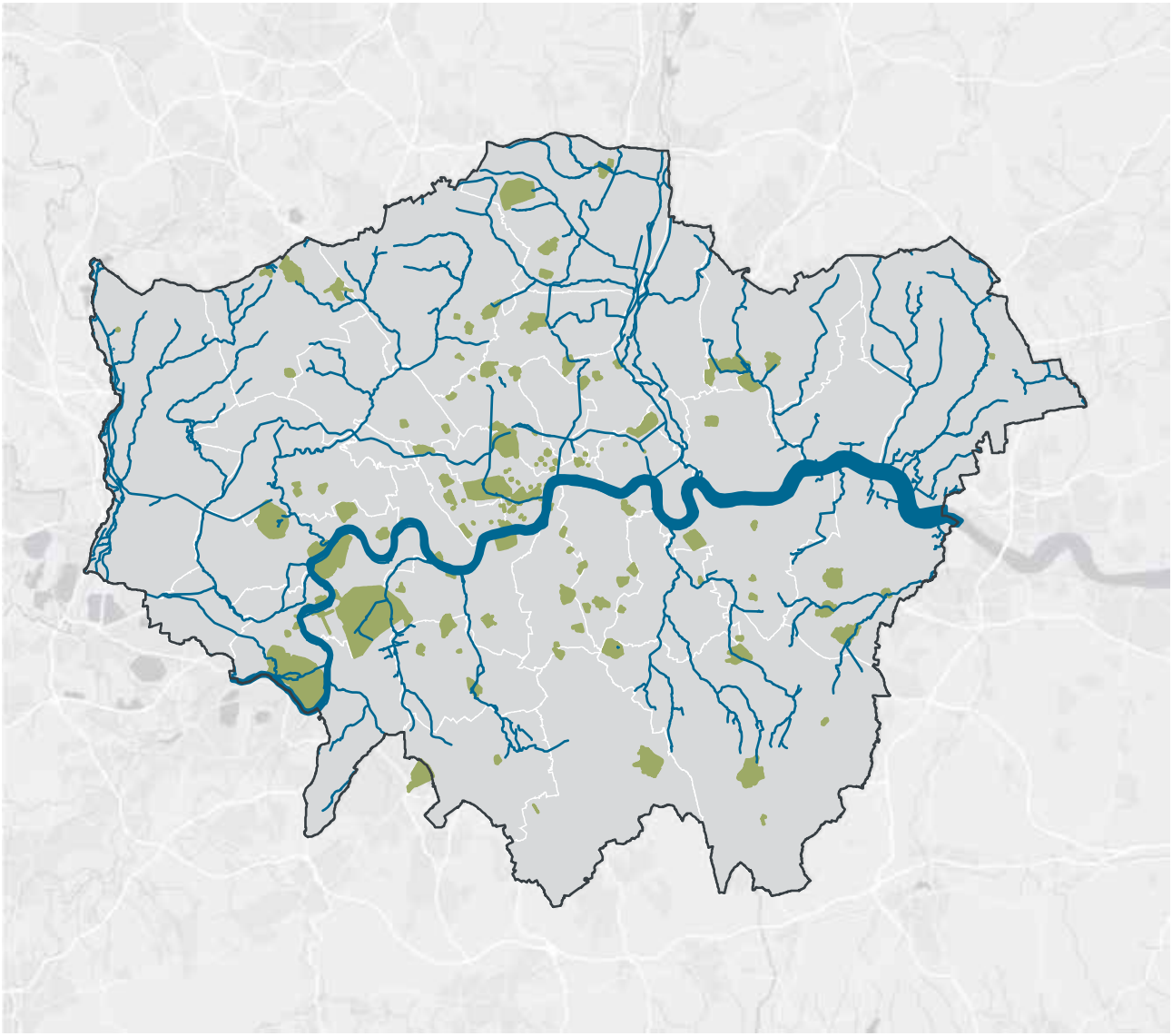
Conservation Areas

London boroughs designate and review these conservation areas and as such the areas of London covered change over time.

Source: Historic England

Contains OS data © Crown copyright and database right (2017)

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

Contains OS data © Crown copyright and database right (2017)

7.1.3 Ensuring the **identification and sensitive management of London's heritage assets** in tandem with promotion of the highest standards of modern architecture will be essential to maintaining the blend of old and new that gives the capital its 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)[98] is a comprehensive and dynamic resource for the historic environment of London containing over 196,000 entries. In addition to utilising this record, boroughs' 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 Development Plans and strategies should demonstrate a clear understanding of the heritage values of a 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, boroughs, heritage specialists, as well as local communities.

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, repair and beneficial re-use of heritage

98 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/

assets that are on the At Risk Register[99]. In some areas, this might be achieved by reflecting existing or original street patterns and blocks; 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. Figure 7.4 illustrates the broad characteristics of London as derived from its historical development, which can be used to inform evidence bases for area-based strategies.

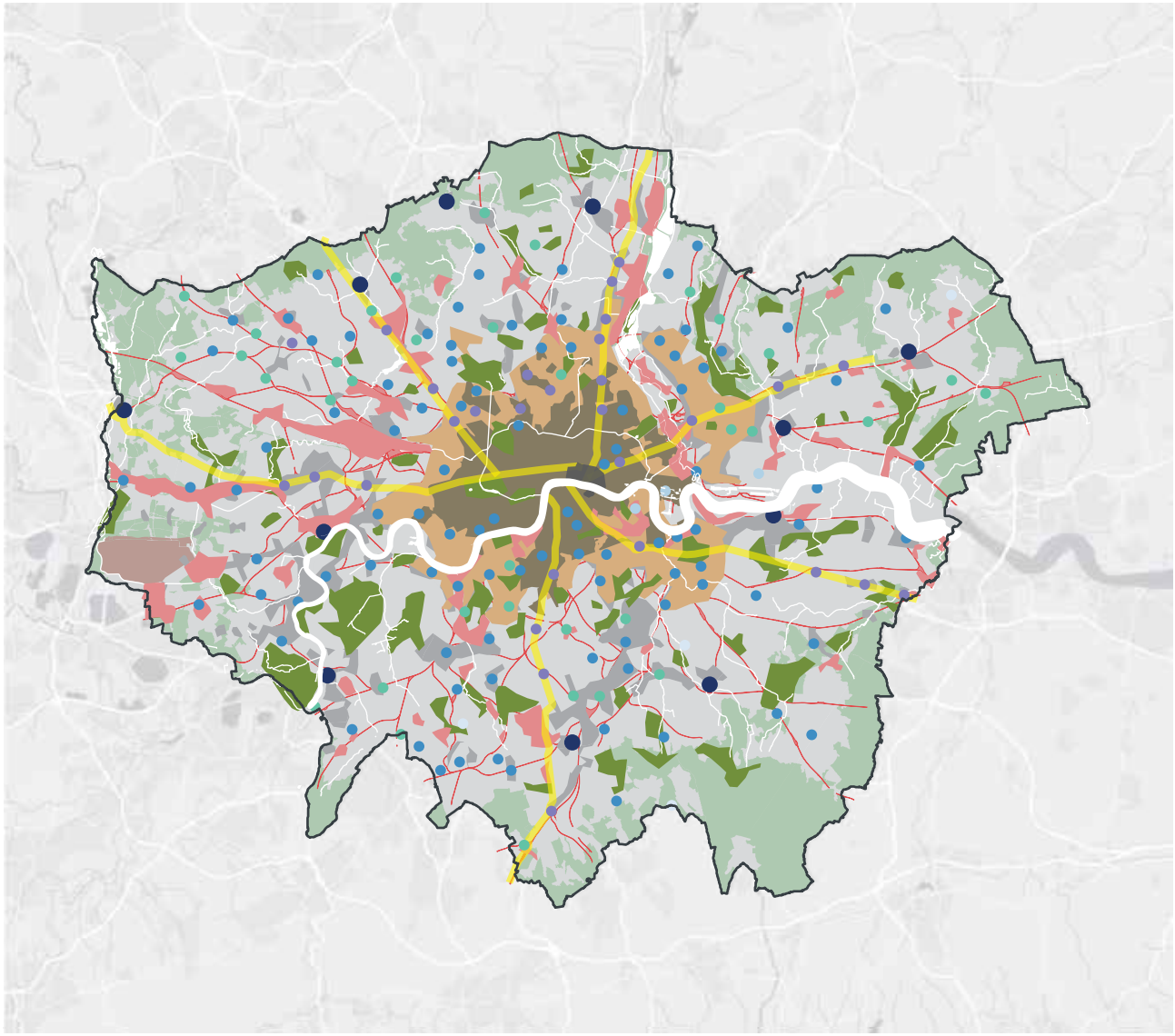
7.1.7 **Heritage significance** can be represented in an asset's form, scale, materials and architectural detail and, where relevant, the historic relationships between heritage assets. Development that affects the settings of heritage assets should respond positively to the assets' significance, local context and character to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to 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.

99 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/.

Figure 7.4 - Outline Character Map of London

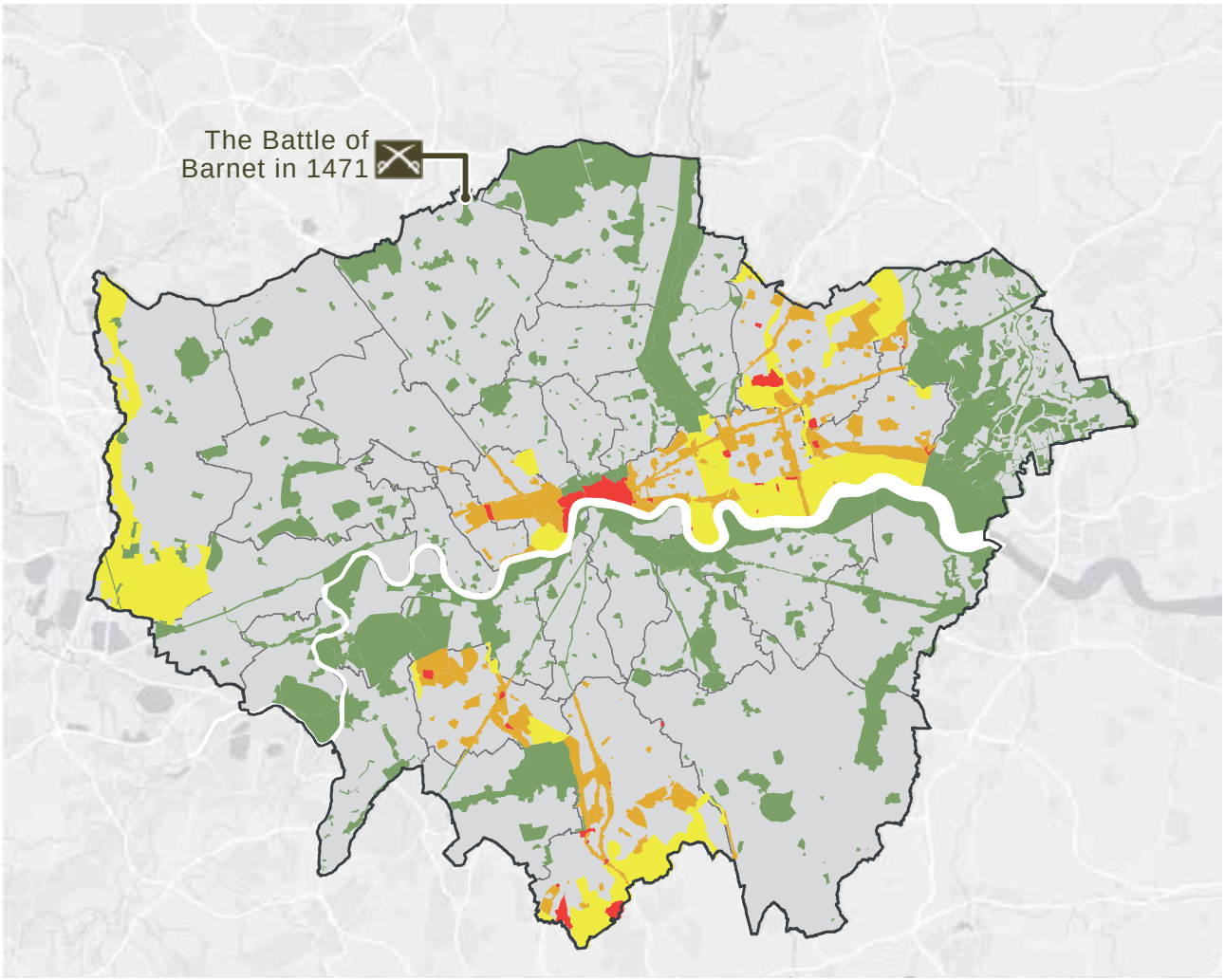


7.1.10 Across London, Local Plans identify areas that have known archaeological interest or potential. The whole of the City of London has high archaeological sensitivity whilst elsewhere the Greater London **Archaeological Priority Area Review Programme** is updating these areas using new consistent London-wide criteria (see Figure 7.5). 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 7.5 - Archaeological Priority Areas and Registered Battlefield



Archaeological Priority Areas and Registered Battlefield

- Tier 1
- Tier 2
- Tier 3
- Other APAs
- Tier 4: Outside of APA
- Registered Battlefield

Source: Historic England

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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 **conserving and enhancing World Heritage Sites' Outstanding Universal Value and their settings**. This duty is transferred to local authorities.

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. Changes to the setting can have either an adverse or beneficial impact on the ability to appreciate the site's 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 the following boroughs 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); Richmond (Royal Botanical Gardens Kew WHS); Southwark (Tower of London WHS, Westminster WHS); Tower Hamlets (The Tower 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 or urban landscapes 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 important 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 in some cases, development is likely to compromise the setting or visibility of a key landmark and should be resisted.

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 both the foreground and 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 Mayor has prepared the London View Management Framework Supplementary Planning Guidance (LVMF SPG) on the **management of views** designated in this Plan. This SPG 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 will be reviewed when necessary to ensure it is compliant with Policy HC3 Strategic and Local Views and Policy HC4 London View Management Framework. 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

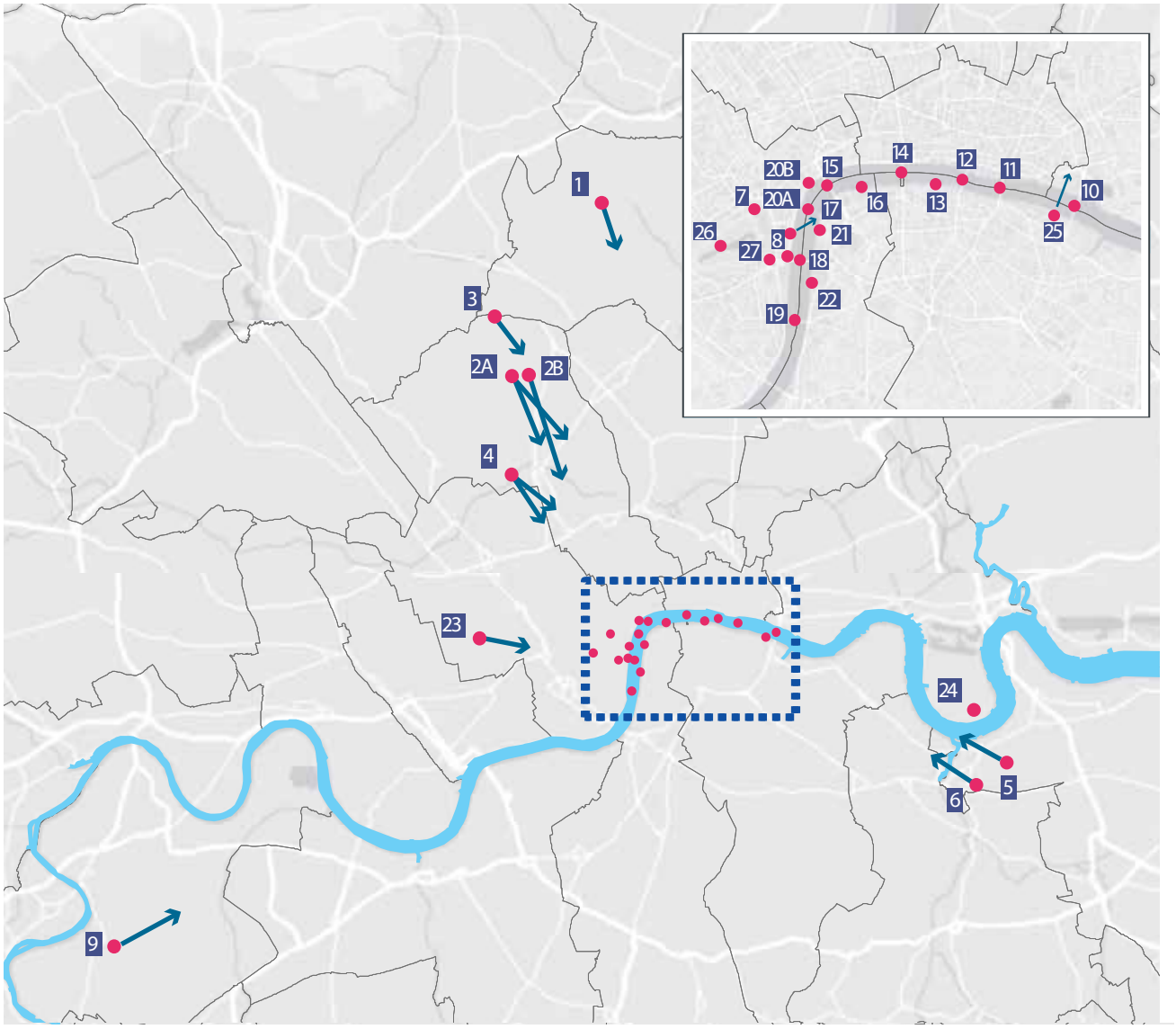
Reference	View
London Panoramas	
1	Alexandra Palace to Central London
2	Parliament Hill to Central London
3	Kenwood to Central London
4	Primrose Hill to Central London
5	Greenwich Park to Central London
6	Blackheath Point to Central London
Linear Views	
7	The Mall to Buckingham Palace
8	Westminster Pier 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

Reference	View
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
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 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 **important local views** in Local Plans and strategies enables the effective management of development in and around the views. Local views should be given the same degree of protection as Strategic Views.

Figure 7.6 - 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 or 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 and middle ground of a designated view should not be overly 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 views 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.

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.

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. In Local Plans and through planning decisions, boroughs 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
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 Low-cost 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 and sites for creative workspace and activities
5) integrate public transport, digital and other infrastructure and service provision such as leisure, recreation 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 D12 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 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, and music and other entertainment venues, including pubs and night clubs. Although primarily serving other functions, the public realm, parks, skate-parks and sports venues can provide important settings for a wide range of arts and cultural activities.

7.5.2 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.

7.5.3 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, clubs and music venues. 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.

7.5.4 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. 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.

7.5.5 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, particularly those with an evening or night-time use, and support 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.

7.5.6 Boroughs are also 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.

7.5.7 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.

7.5.8 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.

7.5.9 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.

7.5.10 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.

7.5.11 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.

7.5.12 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 space for artists and creative businesses.

7.5.13 CEZs should seek to **protect, 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 low-cost business space and affordable workspace is made available in accordance with Policy E2 Low-cost 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.

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 7.7), building on the Mayor's Vision for London as a 24-Hour City.

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, town centres, and where public transport such as the Night Tube and Night Buses are available
2) improve inclusive access 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 and their impact on anti-social behaviour, noise pollution, health and wellbeing and other impacts for residents, 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 be supported. Boroughs should work closely with stakeholders such as 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. 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 its residents, and boroughs should balance the needs of local residents 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 7.7, 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 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, and making town centres safer by increasing activity and providing passive surveillance. Managing issues such as transport, 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. 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.

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, 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 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

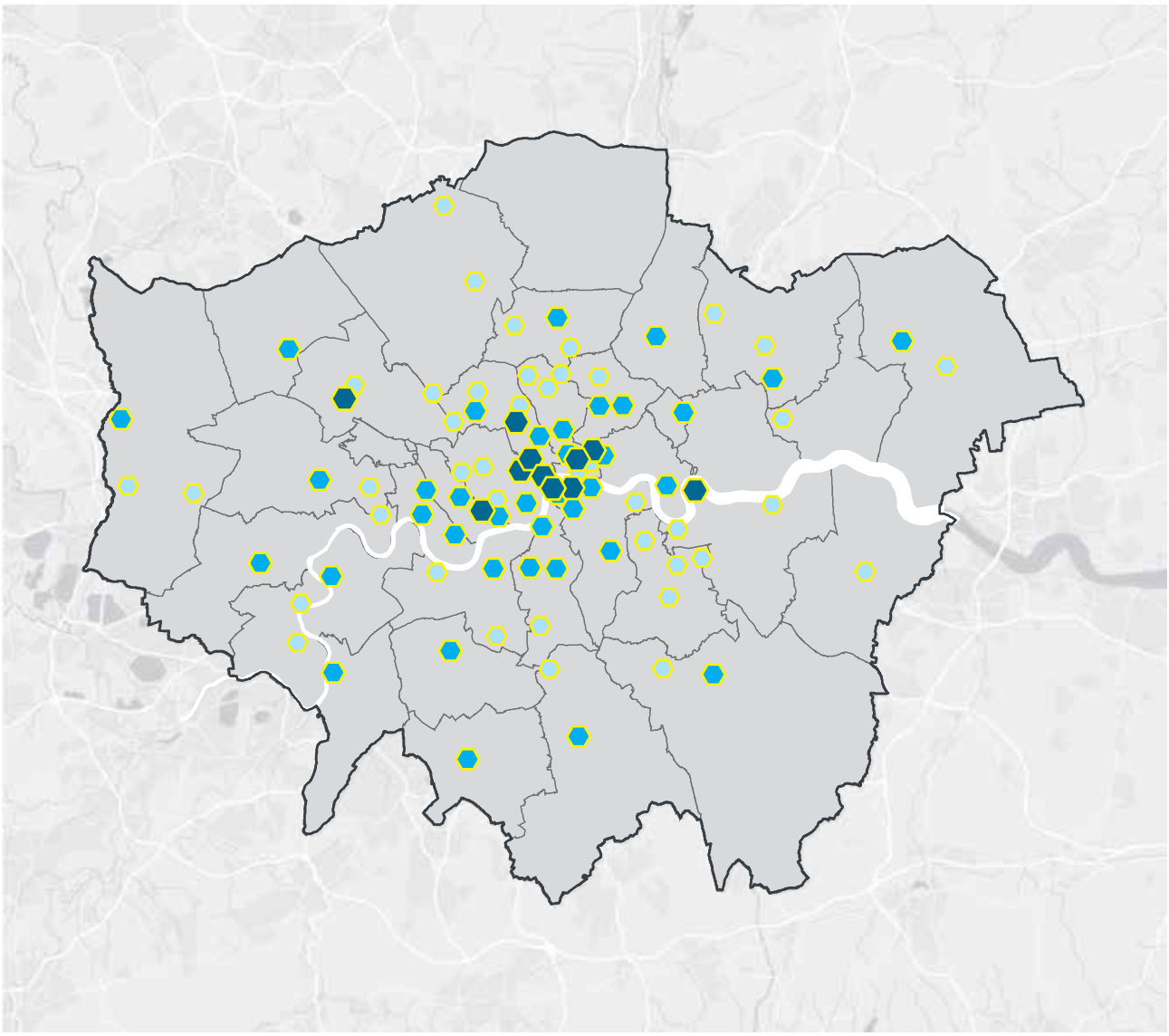
opportunities offered by an extended Night Tube and Night Bus network to increase the night-time offer in town centres for local residents, workers and visitors.

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 wider 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 in order 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.

7.6.11 There are 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. 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. Boroughs should also 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 toilets (see Policy S6 Public toilets), 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, TfL and logistics operators to optimise servicing that occurs at night or supports the night-time economy.

Figure 7.7 - 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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Policy HC7 Protecting public houses

A Boroughs should:

1) protect public houses where they have a heritage, economic, social or cultural value to local communities, and where they contribute to wider policy objectives for town centres, night-time economy areas and Creative Enterprise Zones

2) support proposals for new public houses to stimulate town centre regeneration, cultural quarters, the night-time economy and mixed-use development, where appropriate.

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 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+ community. However, **pubs are under threat from closure** and redevelopment pressures, with

nearly 1,200 pubs in London lost in 15 years[100]. 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, their long-standing use as a public house, their history 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 D12 Agent of Change) and any potential negative impacts.

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 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.

100 Closing time: London's public houses, GLA Economics, April 2017 - https://www.london.gov.uk/sites/default/files/closing-time-pubs-final.pdf

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 for at least 24 months as a pub 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 are encouraged to resist such proposals or ensure developers put in place measures that would mitigate the impacts of noise for new and subsequent residents.

Chapter 8

Green Infrastructure and Natural Environment



Policy G1 Green infrastructure

A London's network of green and open spaces, and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.

B Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

C Development Plans and Opportunity Area Planning Frameworks should:

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.

8.1.1 A **green infrastructure approach** recognises that the network of green spaces, street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in a more integrated way to meet multiple objectives including: promoting mental and physical health and wellbeing; adapting to the impacts of climate change; improving air and water quality; encouraging walking and cycling; and conserving and enhancing 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 seen as an integral element and not as an 'add-on'. It's **economic and social value** has become increasingly evident across all of London at all scales and has been highlighted in the London i-Tree Assessment[101] and the Natural Capital Account for London's Public Parks[102].

8.1.3 To help deliver on his manifesto commitment to make London at least 50 per cent green by 2050, the Mayor will review and update existing Supplementary Planning Guidance on the All London Green Grid –

101 https://www.forestry.gov.uk/pdf/LONDONI-TREECOREREPORT151202.pdf

102 Published late 2017. Link unavailable at time of publication.

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

2) the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.

B The extension of the Green Belt will be supported, where appropriate. It' s de-designation will not.

8.2.1 The Mayor strongly supports the **continued protection of London's Green Belt**. The NPPF[103] 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 reducing the urban heat island effect. 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.

103 NPPF paras 79 – 92

Policy G3 Metropolitan Open Land

A Metropolitan Open Land (MOL) should be protected from inappropriate development:

1) development proposals that would harm MOL should be refused
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.

C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.

D 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.

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, and health benefits through encouraging walking, running and other physical activity.

8.3.2 The principles of national Green Belt policy[104] also apply to MOL. Any proposed **changes to MOL boundaries** which result in loss must be

[104] NPPF paras 79-92

accompanied by thorough evidence which demonstrates that there are exceptional circumstances, as set out in the NPPF. The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy.

8.3.3 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 Local green and open space

A Local green and open spaces should be protected.

B The creation of new areas of publicly-accessible green and open space should be supported, especially in areas of deficiency in access to public open space.

C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required[105].

D The loss of green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.

E Development Plans and Opportunity Area Frameworks should:

1) include appropriate designations and policies for the protection of green and open space to address deficiencies
2) ensure that future green and open space needs are planned for in areas with the potential for substantial change
3) ensure that green and open space needs are planned in line with objectives in green infrastructure strategies in order to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure.

105 http://www.gigl.org.uk/open-spaces/areas -of-deficiency-in-access-to-public-open-space

8.4.1 Green and open spaces – 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**. Although individual spaces may not provide the strategic functions of Green Belt or MOL, they are nonetheless important at the neighbourhood level, as they are the spaces which most Londoners use most often. Connectivity across the network of green and open spaces is particularly important as this provides opportunities for walking and cycling and for improving wildlife corridors.

8.4.2 Boroughs should undertake a green and open space needs assessment to inform their **green infrastructure strategy** (drawing from existing strategies such as play, trees and playing pitches).

8.4.3 The creation of new green or open space is essential in helping to meet the Mayor's long-term target of making more than 50 per cent of London green by 2050. **New provision or improved access** should be particularly encouraged in areas of deficiency in access to public open space. It will also be important to secure appropriate management and maintenance of open spaces to ensure that a wide range of benefits can be secured and that any conflicts between uses are minimised.

8.4.4 Proposals to **enhance green and open spaces** to provide a wider range of benefits for Londoners will be encouraged. Examples could include improved public access for all, inclusive design, recreation facilities, habitat creation, landscaping improvement or flood storage.

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
Small Open Spaces	These include 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

Open Space categorisation	Description	Size guideline	Distance from homes
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 are often characterised by features or attractive areas which are not fully accessible to the public but contribute to the enjoyment of the space.		

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.

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 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.

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[106]. 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. Residential development places greater demands on green infrastructure, and as such, a higher standard is justified.

8.5.4 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 sqm footprint on a site of 1,000 sqm including a green roof, 250 sqm car parking, 100 sqm open water and 50 sqm 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

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.

106 Urban Greening Factor for London 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. woodland, flower-rich grassland) created on site.	1
Wetland or open water (semi-natural; not chlorinated) created on site.	1
Intensive green roof or vegetation over structure. Vegetated sections only. Substrate minimum settled depth of 150mm – see livingroofs.org for descriptions[A].	0.8
Standard trees planted in natural soils or 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 Centre for Designed Ecology for case-studies[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

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://cfde.co.uk/front-page/about/case-studies/

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 http://www.susdrain.org

Policy G6 Biodiversity and access to nature

A Sites of Importance for Nature Conservation (SINCs) should be protected. The greatest protection should be given to the most significant sites.

B In developing Development Plan policies, boroughs should:

1) use the relevant procedures to identify SINCs and green corridors. 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
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) seek opportunities to create habitats that are of particular relevance and benefit in an urban context
4) include policies and proposals for the protection and conservation of priority species and habitats and opportunities for increasing species populations
5) ensure sites of European or national nature conservation importance are clearly identified and appropriately assessed.

C Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following approach should be applied to minimise development impacts:

1) avoid adverse impact to the special biodiversity interest of the site
2) minimise the spatial impact and mitigate it by improving the quality or management of the rest of the site
3) seek appropriate off-site compensation only in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.

D Biodiversity enhancement should be considered from the start of the development process.

E Proposals which create new or improved habitats that result in positive gains for biodiversity should be considered positively, as should measures to reduce deficiencies in access to wildlife sites.

8.6.1 **Sites of Importance for Nature Conservation** (SINCs) comprise:

1. European sites (i.e. Special Protection Areas, Special Areas of Conservations (actual or candidate) and Ramsar sites)
2. National sites (i.e. National Nature Reserves, Sites of Special Scientific Interest)
3. Sites of Metropolitan Importance – strategically-important conservation sites for London
4. Sites of Borough Importance – sites which support habitats or species of value at the borough level
5. Sites of Local Importance – sites which are important for the provision of access to nature at the neighbourhood level.

Sites with a European or national designation are protected under their own legislation. For example, Special Protection Areas are protected under the EC Birds Directive and National Nature Reserves are protected under the Wildlife & Countryside Act 1981. The higher up the above hierarchy a SINC is placed, the more any harm to it should be avoided. Before compensatory provision is identified as the only solution to a European site conflict, it is necessary to demonstrate that there are no alternatives to the European site and that Imperative Reasons of Overriding Public Interest (IROPI) exist which justify why the project should proceed.

8.6.2 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. Improved 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.

8.6.3 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 as well as habitat creation targets and a comprehensive list of priority species and habitats that require particular consideration when planning decisions are made.

8.6.4 The London Wildlife Sites Board offers help and guidance to boroughs on the selection of SINCs[107]. The relevant procedures for identifying SINCs are currently set out as Appendix 1 to the Biodiversity Strategy 2002, which will become an appendix to the final London Environment Strategy once adopted.

8.6.5 **London's water spaces** make up an important set of habitats in London. Policy SI17 Protecting London's waterways addresses the multi-functional use, protection and development of water spaces, with a particular priority for improving and restoring sections of river. The habitat value of waterways is a key element of their future management.

Policy G7 Trees and woodlands

A Trees and woodlands should be protected, 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

2) identify opportunities for tree planting in strategic locations.

107 https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/biodiversity

C Development proposals should ensure that, wherever possible, existing trees of quality are retained[108]. If it is imperative that trees have to be removed, 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. 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.

108 Category A and B trees 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, 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 produced Supplementary Planning Guidance on preparing tree strategies to help boroughs plan for the management of the urban forest[109]. These should be part of boroughs' wider green infrastructure strategies.

8.7.2 The Mayor wants to increase tree cover in London by 10 per cent by 2050. 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 Right Trees for a Changing Climate[110] and guidance produced by the Trees and Design Action Group[111], a multi-disciplinary cross-partnership forum seeking to promote urban forests.

8.7.3 An i-Tree Eco Assessment of London's trees quantified the benefits and services provided by the capital's **urban forest**[112]. This demonstrated

109 https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-guidance/tree-and-woodland

110 http://www.righttres4cc.org.uk

111 http://www.tdag.org.uk/guides--resources.html

112 https://www.london.gov.uk/sites/default/files/valuing_londons_urban_forest_itree_report_final.pdf

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[113] or i-Tree Eco[114].

Policy G8 Food growing

A In Development Plans, boroughs should:

1) protect existing allotments and encourage provision of space for community gardening, including for food growing, within new developments
2) identify potential sites that could be used for commercial 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 new schools.

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

113 https://www.ltoa.org.ul/resources/cavat

114 hppts://www.itreetools.org/eco/

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 Where relevant, 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).

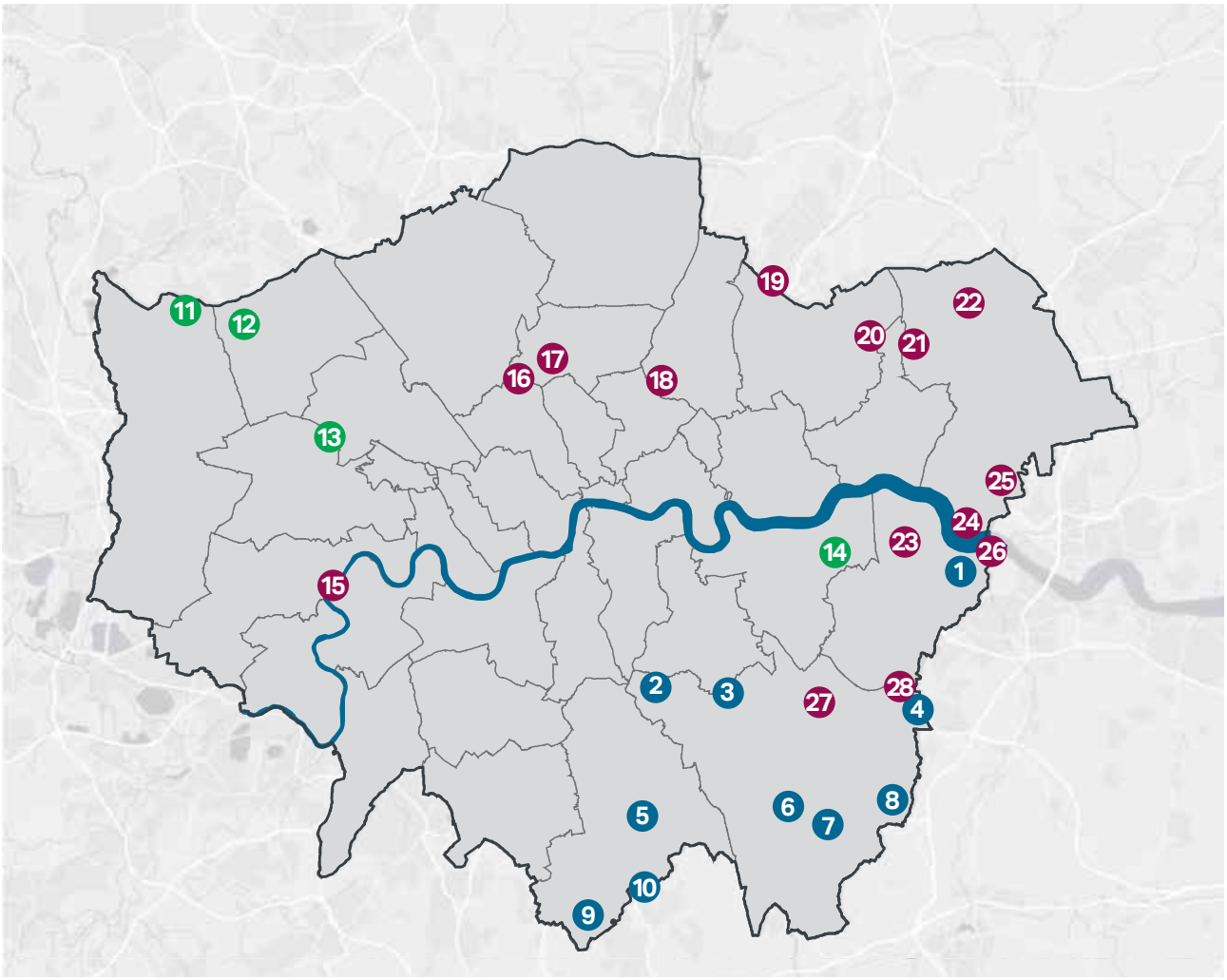
8.9.2 National planning policy is clear that boroughs should **protect, promote and enhance geodiversity**. London's geodiversity sites are shown in Figure 8.1. Geodiversity sites with existing or proposed European or national designations are Sites of Special Scientific Importance and subject to statutory 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 for all 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 8.1 - Geodiversity sites



Sites of National/ Regional Geodiversity Importance

- Recommended RIGS
- Proposed RIGS
- Potential RIGS

Reference numbers refer to the London Foundations SPG 2012

Source: GLA Planning

Contains OS data © Crown copyright and database right (2017)

Chapter 9

Sustainable Infrastructure



Policy SI1 Improving air quality

A London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced:

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) reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality
   d) create unacceptable risk of high levels of exposure to poor air quality.
2) 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. Particular care should be taken with developments that are 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.
3) The development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral.
4) 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[115].
5) Air Quality Assessments (AQAs) should be submitted with all major developments, unless they can demonstrate that transport and building emissions will be less than the previous or existing use.

115 Guidance is currently in 'The control of dust and emissions for construction and demolition SPG'

6) Development proposals should ensure that where emissions need to be reduced, this is done on-site. Where it can be demonstrated that on-site provision is impractical or inappropriate, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated.

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.

9.1.2 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[116]. 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.

9.1.3 For larger-scale development areas such as Opportunity Areas, or those large enough to already require an Environmental Impact Assessment, there should be an aim to be **Air Quality Positive** by implementing measures across the area that will actively reduce air pollution. This could be achieved, for example, by the provision of low or zero-emission heating and energy, or improvements to public transport, walking and cycling infrastructure, and designing out features such as street canyons that prevent effective dispersion of pollutants. Data from the use of smart infrastructure such as sensors could contribute to beneficial design solutions.

9.1.4 For major developments, a **preliminary AQA** 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

116 Air Quality Standards Regulations 2010, or subsequent revisions thereof

- Appropriate land uses for the site
- Appropriate design measures that could be implemented to ensure that development reduces exposure and improves air quality.

9.1.5 **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.

9.1.6 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. **Impact assessments** 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.

9.1.7 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.

9.1.8 **Air Quality Focus Areas** (AQFA) are locations that not only exceed the EU annual mean limit value for nitrogen dioxide (NO_2) 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 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.

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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9.1.9 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**.

9.1.10 Where there have been significant improvements to air quality resulting in an area no longer exceeding air quality limits, development should not take advantage of this investment and worsen the local air quality back to a poor level.

9.1.11 Further **guidance** will be published on Air Quality Neutral and Air Quality Positive standards as well as guidance on how to reduce construction and demolition impacts.

Policy SI2 Minimising greenhouse gas emissions

A Major development should be net zero-carbon. This means reducing carbon dioxide emissions from construction and 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 construction and operation.

2) Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI3 Energy infrastructure.

3) Be green: generate, store and use renewable energy on-site.

B Major development should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and will be expected to monitor and report on energy performance.

C In meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations[117] is expected. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency

[117] Building Regulations 2013. If these are updated, the policy threshold will be reviewed

measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided:

1) through a cash in lieu contribution to the relevant borough's carbon offset fund, and/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 greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.

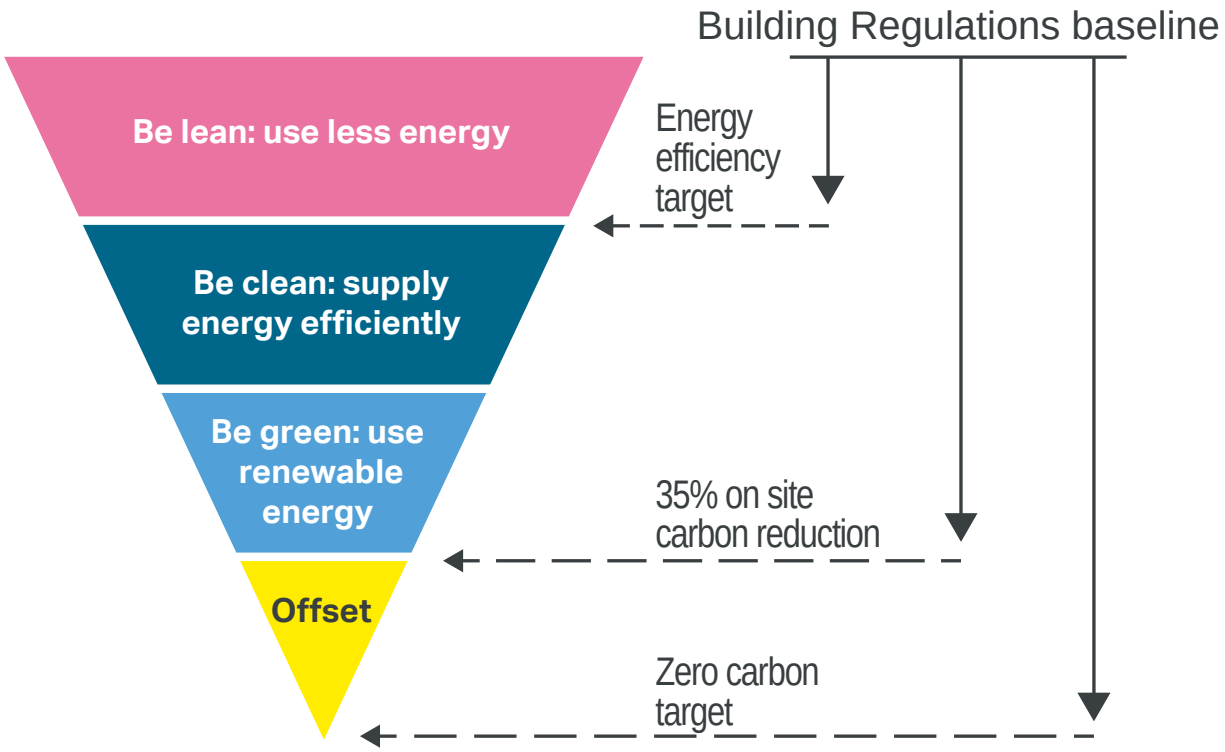
9.2.1 The Mayor is committed to London **becoming a zero-carbon city**. This will require reduction of all greenhouse gases, of which carbon dioxide is the most prominent[118]. London's homes and workplaces are responsible for producing approximately 78 per cent of its greenhouse gas emissions. If London 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.

118 '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.

Figure 9.2 - The energy hierarchy and associated targets



Source: Greater London Authority

9.2.4 A zero-carbon target for major residential developments has been in place for London since October 2016. This target will be **extended to include major non-residential developments** on final publication of this Plan (expected 2019).

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[119]. 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 Developments are expected to achieve carbon reductions beyond part L from **energy efficiency measures** alone to reduce energy demand

[119] Building Regulations 2013. If these are updated, the policy threshold will be reviewed.

as far as possible. Residential development should aim to achieve 10 per cent and non-residential development should aim to 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.

9.2.7 The price for offsetting carbon[120] 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** do 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.

9.2.8 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[121].

9.2.9 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.

9.2.10 The Mayor may publish further planning guidance on sustainable design and construction[122] and will continue to regularly update the guidance

120 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.

121 For examples see London Environment Strategy.

122 This will build on the 2014 Sustainable Design and construction SPG.

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 dioxide emissions covered by Building Regulations and, separately, the energy demand and carbon dioxide 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 dioxide 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 dioxide 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 SI3 Energy infrastructure).

d. Proposals to further reduce carbon dioxide emissions through the generation and use of on-site renewable energy, utilising storage technologies where appropriate.

e. Proposals to address air quality risks (see Policy SI1 Improving air quality). Where an air quality assessment has been undertaken, this could be referenced instead.

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 SI4 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. Proposals for how energy demand and carbon dioxide emissions post-construction will be monitored annually (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. Proposals to minimise the embodied carbon in construction.

l. Analysis of the expected cost to occupants associated with the proposed energy strategy.

Policy SI3 Energy infrastructure

A Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy requirements and infrastructure 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 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
4) possible opportunities to utilise energy from waste
5) secondary heat sources
6) opportunities for low temperature heat networks
7) possible land for energy centres and/or energy storage
8) possible heating and cooling network routes
9) opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
10) infrastructure and land requirements for electricity and gas supplies
11) implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector.

C Development Plans should:

1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements including upgrades to existing infrastructure
2) identify existing heating and cooling networks and opportunities for expanding existing networks and establishing new networks.

D Major development proposals within Heat Network Priority Areas should have a communal 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 available local secondary heat sources (in conjunction with heat pump, if required, and a lower temperature heating system)
    c) generate clean heat and/or power from zero-emission sources
    d) use fuel cells (if using natural gas in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)
    e) use low emission combined heat and power (CHP) (in areas where legal air quality limits are exceeded all development proposals must provide evidence to show that any emissions related to energy generation will be equivalent or lower than those of an ultra-low NOx gas boiler)
    f) 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 there is no significant impact on local air quality.
3) Where a heat network is planned but not yet in existence the development should be designed for connection at a later date.

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 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 will become an increasingly important element of London's energy supply and will help London become more self-sufficient in relation to its energy needs.

9.3.3 Developments should connect to existing **heat networks**, wherever feasible. Stimulating the delivery of new district heating infrastructure enables the opportunities that district heating can deliver to be maximised. The Mayor has identified Heat Network Priority Areas, which can be found on the London Heat Map website[123]. 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.

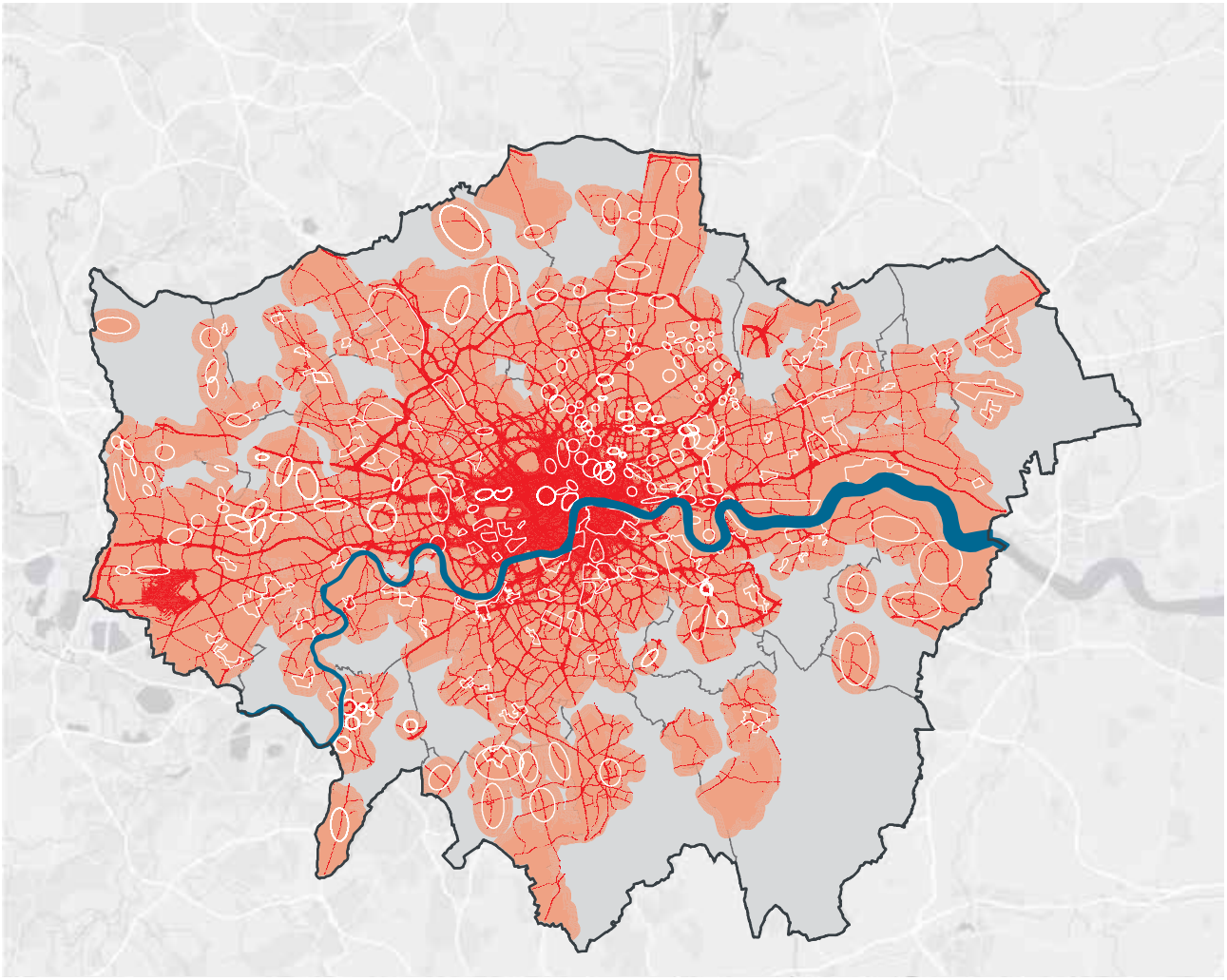
9.3.4 Where developments are proposed within Heat Network Priority Areas but are beyond existing heat networks, the heating system should be designed to **facilitate future connection**. This may include for example, allocating space in plant rooms for heat exchangers, safeguarding suitable routes for pipework and making provision for connections at the site boundary. The Mayor is taking a more direct role in the delivery of 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.

9.3.5 To ensure heat networks operate efficiently, effectively and reliably, the Mayor supports standards such as the CIBSE CP1 Heat Networks: Code of Practice for the UK and the Heat Trust standard. These set out principles for good design, specification and operation of networks and can help ensure fairness for customers of heat networks. 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.

123 https://www.london.gov.uk/what-we-do/environment/energy/london-heat-map

9.3.6 Further information about the relevance of **CHP** in developments of various scales will also be provided in the Energy Planning Guidance document, which will be kept updated as technology changes. However, it is not expected that gas engine CHP will be able to meet the standards required within areas exceeding air quality limits with the technology that is currently available.

Figure 9.3 - Heat Network Priority Areas



Heat Network Priority Areas and Heat Density in London

Relative heat demand based on fuel use kWh/m²/year

- Heat Network Priority Areas
- Areas where legal air quality limits are exceeded
- Local Authority Heat Network Studies

Source: GLA Environment

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9.3.7 Increasing the amount of new **renewable energy sources** in London developments is supported. This includes the use of energy from waste schemes that are connected to a heat network, as well as solar photovoltaics 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.

9.3.8 **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 electrifying 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 industry, boroughs and developers to ensure that appropriate infrastructure is in place to meet London's needs. Energy masterplans are expected to identify any necessary electricity infrastructure.

9.3.9 Demand for **natural gas** in London has been decreasing over the last few years, with a 25 per cent reduction since 2000[124]. 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 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.

9.3.10 National Grid and Southern Gas Networks 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.

9.3.11 Land will be required for energy supply infrastructure including **energy centres**. These centres can capture and store energy as well as generate, supply and distribute it. The ability to efficiently store energy could reduce overall energy consumption, reduce peak demand and make renewable energy more effective.

124 Based on data from London Energy and Greenhouse Gas Inventory (LEGGI)

Policy SI4 Managing heat risk

A Development proposals should minimise internal heat gain and the impacts of the urban heat island through design, layout, orientation and materials.

B Major development proposals should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

1) minimise internal heat generation through energy efficient design
2) reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation and the provision of green roofs and walls
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 and the urban heat island effect, means that **London must manage heat risk** in new developments, using the cooling hierarchy set out above.

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 some young or elderly Londoners, the effects can be potentially lethal. Green roofs

can provide some mitigation of this effect by shading roof surfaces and through evapotranspiration.

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. There are a number of low-energy-intensive measures that can **mitigate overheating risk**. These include solar shading, building orientation and solar-controlled glazing.

9.4.4 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. Therefore, passive ventilation should be prioritised. 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. The GLA's Energy Planning Guidance provides further information on how these guidance documents and datasets should be used.

Policy SI5 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 ensure security of supply. This should be done in a timely, efficient and sustainable manner taking energy consumption into account.

C Development proposals should:

1) 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 (commercial development)

3) be encouraged to 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 strategic 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

2) be designed to ensure that misconnections between foul and surface water networks are eliminated and not easily created through future building alterations.

9.5.1 Londoners consume on average 156 litres of water per person per day – around 17 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[125]. 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[126], 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.

9.5.4 Variations of the following **four strategic water supply options** to serve London are under consideration through Thames Water's Water Resource

125 Planning Practice Guidance: Paragraph 014 Reference ID: 56-014-20150327: Where there is a clear local need, boroughs can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement.

126 http://www.europeanwaterlabel.eu/thelabel.asp

Management Plan process and one or a combination of some of these are expected to be proposed to serve parts of the Wider South East including London:

- treatment / re-use of effluent from sewage treatment works – likely within London
- desalination – potentially within London
- transfer of river water from the River Severn to the River Thames catchment
- a new reservoir – likely to be near the Upper Thames in Oxfordshire.

9.5.5 The Mayor is reviewing the available information on each of the supply options alongside evidence of their impacts on Londoners and Mayoral priorities. In preparing its Water Resource Management Plans, Thames Water is exploring coordinated supply options with the other water companies serving London and the South East of England through the Water Resource South East expert group. Water Resource East is undertaking similar work in the East of England area. All this will involve **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 (see also paragraph 9.3.8), 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**, 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.

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).

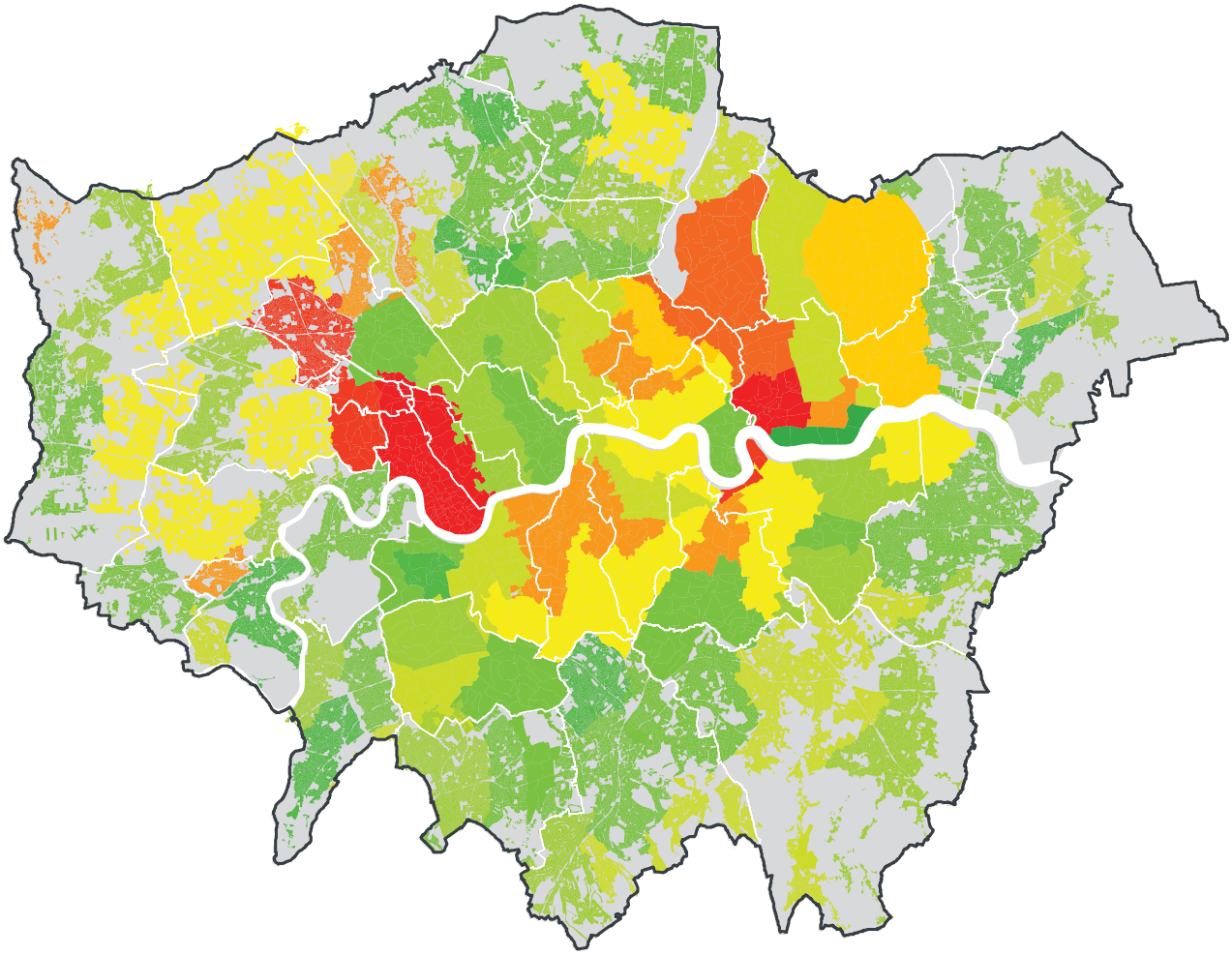
9.5.10 The Thames Tideway Tunnel is under construction and will help to improve the water quality of the River Thames by significantly reducing the frequency of untreated sewage being discharged into the Thames (known as combined sewer overflows). Thames Water is also planning a major sewer tunnel in the Counters Creek catchment of west London. **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.

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 be designed to ensure that the potential for misconnections is eliminated.

9.5.12 **Integrated Water Management Strategies** should be considered for major development locations such as Opportunity Areas, where particular flood risk and water-related constraints such as limited sewer capacity require an integrated approach to the provision of infrastructure and management of risk.

9.5.13 A **water advisory group** has been established to advise the Mayor on strategic water and flood risk management issues.

Figure 9.4 - Spatial illustration of the 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

Source: Thames Water

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This figure must be used in conjunction with paragraph 9.5.14 of the London Plan (draft December 2017)

9.5.14 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 and hence increasing flows upstream will exacerbate performance in the downstream catchments.

Policy SI6 Digital connectivity infrastructure

A To ensure London's global competitiveness now and in the future, development proposals should:

1) achieve greater digital connectivity than set out in part R1of the Building Regulations
2) ensure that sufficient ducting space for future digital connectivity infrastructure is provided
3) meet requirements for mobile connectivity within the development and take appropriate mitigation measures to avoid reducing mobile connectivity in surrounding areas
4) support the effective use of the public realm (such as street furniture and bins) to accommodate well-designed and located mobile digital infrastructure.

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.

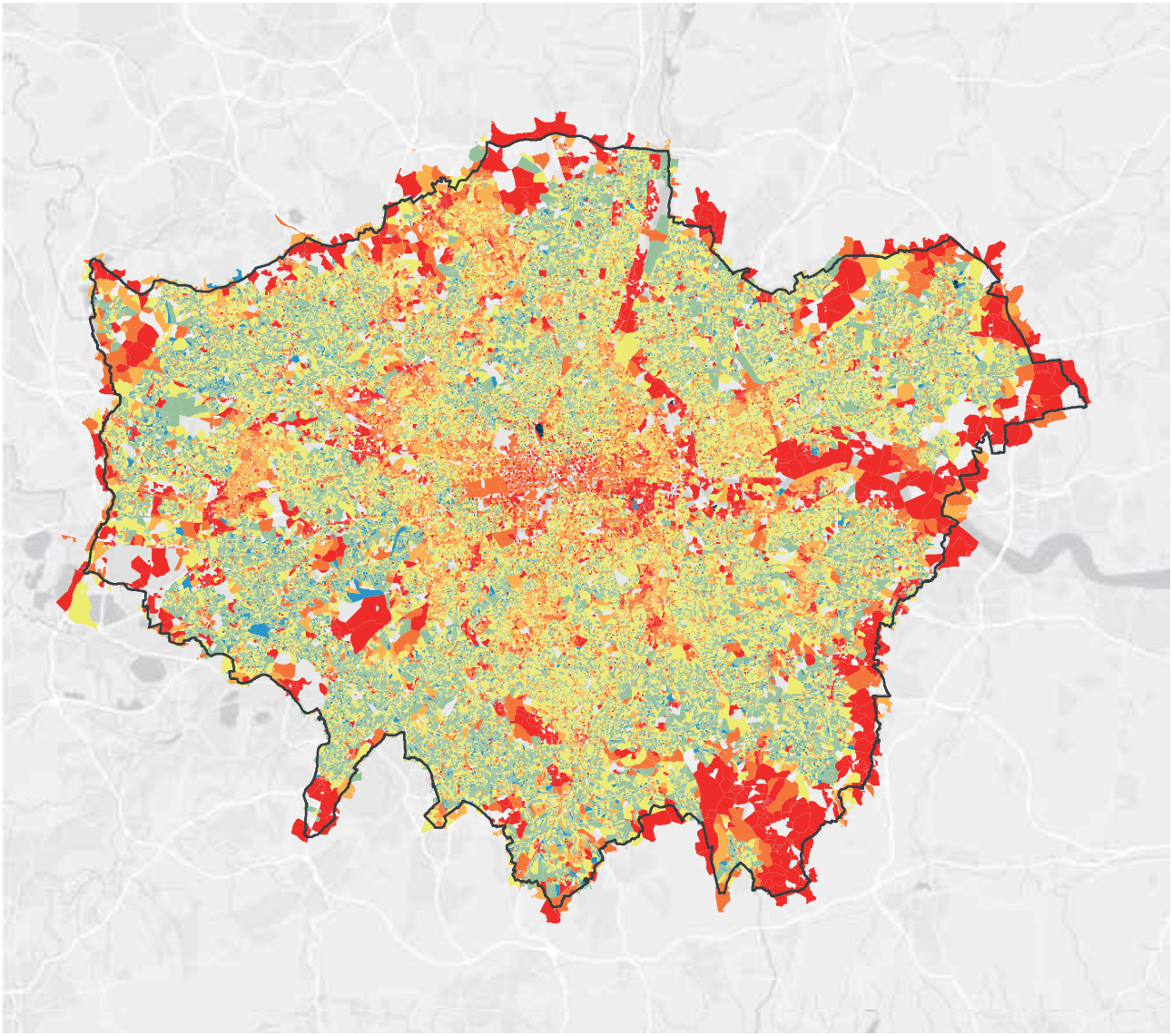
9.6.3 **Better digital connectivity** with a focus on affordability, security, resilience and the provision of appropriate electrical power supply should be promoted across the capital. The specific requirements of business clusters, such as a symmetrical service with the same upload and download speeds, 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 high-speed (at least 30 Mbps) ready in-building physical infrastructure, however new developments using higher-grade infrastructure could achieve connectivity speeds closer to 1 Gbps. 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 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 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function).

9.6.6 The Mayor will work with providers, 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

Figure 9.5 - Broadband speed 2016



Average download speed of all connections - 2016

in Mbit/s

- 0 - 10
- 11 - 20
- 21 - 30
- 31 -50
- 51 -75
- 76 - 200
- 201 - 300

Source: Ofcom

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barriers to delivery to address this form of digital exclusion, in particular through his 'not-spot' work. Boroughs should encourage the delivery of high-quality / world-class digital infrastructure as part of their digital strategies or corporate plans.

9.6.7 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, 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.

Policy SI7 Reducing waste and supporting the circular economy

A Waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by:

1) promoting 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) encouraging waste minimisation and waste avoidance through the reuse of materials and using fewer resources in the production and distribution of products
3) ensuring that there is zero biodegradable or recyclable waste to landfill by 2026
4) meeting or exceeding the recycling targets for each of the following waste streams and generating low-carbon energy in London from suitable remaining waste:
    a) municipal waste[127] – 65 per cent by 2030
    b) construction, demolition and excavation waste – 95 per cent by 2020

[127] Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes local authority collected waste and waste collected by the private sector.

5) designing developments with adequate and easily accessible storage space that supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

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 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 to support recycling and re-use
5) how much waste the proposal is expected to generate, and how and where the waste will be handled.

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.

9.7.2 In 2015[128] 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

128 https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports

9.7.3 The London Environment Strategy sets out the Mayor's approach to waste management in detail. The Mayor is committed to meeting or exceeding the **recycling targets** for each of the following waste streams, and to generating low-carbon energy in London from suitable remaining waste:

- municipal waste[129] – 65 per cent recycling/composting by 2030
- construction, demolition and excavation waste – 95 per cent recycling by 2020

9.7.4 Re-use and recycling rates for **construction, demolition and excavation** waste (CD&E) in London is estimated between 50-60 per cent[130] for 2015 with some large construction projects including the Olympic Park achieving 85 – 95 per cent recycling rates. Nevertheless, more beneficial and higher order uses of this inert waste, for example in conjunction with land reclamation or coastal defences, are possible. A combination of mobile facilities on construction sites, effective use of existing waste processing sites and, where appropriate, safeguarded wharves, as well as the provision of recycling facilities at aggregate extraction sites, should be capable of meeting the anticipated future requirement within London to achieve a more beneficial re-use of this material.

9.7.5 When it is intended to **export waste** to landfill outside of London, it will be important to show that the receiving authority has the capacity to deal with waste over the lifetime of the development. This will also help receiving authorities plan for future needs.

9.7.6 Further guidance on Circular Economy Statements will be produced.

129 Based on the EU definition of municipal waste being household waste and other waste similar in composition to household waste. This includes local authority collected waste and commercial waste.

130 Based on CDE waste data interrogator data 2015. Estimate only as actual CDE 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.

Policy SI8 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 SI9 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) identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantums of waste will be managed
2) allocate sufficient land 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
3) 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 Employment Sites / land
    c) safeguarded wharves with an existing or future potential for waste and secondary material management.

C The following are particularly encouraged – development proposals which:

1) deliver a range of complementary waste management and secondary material processing facilities on a single site
2) support prolonged product life and production of secondary materials including repair, refurbishment and remanufacture

3) contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste
4) provide combined heat and power and/or combined cooling heat and power
5) contain proposals to effectively deal with CD&E waste on site and minimise export to landfill.

D 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) job creation and social value benefits including skills, training and apprenticeship opportunities
3) achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings - 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.

Table 9.1 - Forecast arisings of Household and Commercial & Industrial waste by borough 2021-2041 (000's tonnes)

Borough	2021	2041
Barking & Dagenham	214	230
Barnet	315	340
Bexley	225	242
Brent	260	274
Bromley	250	268
Camden	360	374
City of London	230	238
Croydon	305	327
Ealing	291	306
Enfield	305	327
Greenwich	209	227
Hackney	183	196
Hammersmith & Fulham	183	190
Haringey	190	201
Harrow	188	205
Havering	230	249
Hillingdon	347	367
Hounslow	260	276
Islington	242	252
Kensington & Chelsea	202	211
Kingston	152	161
Lambeth	208	220
Lewisham	191	206
Merton	173	184
Newham	244	261
Redbridge	196	216
Richmond	180	191
Southwark	292	308
Sutton	161	173
Tower Hamlets	260	273
Waltham Forest	202	180
Wandsworth	250	264
City of Westminster	722	750
London total	8,216	8,726

Table 9.2 - Borough-level apportionments of Household and Commercial & Industrial waste 2021-2041 (000's tonnes)

Borough	Apportion-ment*	2021	2041
Barking & Dagenham	6.1	505	537
Barnet	2.6	215	229
Bexley	5.6	456	485
Brent	5.0	412	438
Bromley	2.3	192	204
Camden	1.6	133	141
City of London	1.0	84	89
Croydon	3.1	252	268
Ealing	6.6	543	576
Enfield	4.3	356	379
Greenwich	4.1	338	359
Hackney	1.3	110	118
Hammersmith & Fulham	2.6	210	222
Haringey	2.3	192	204
Harrow	1.9	151	170
Havering	4.5	369	383
Hillingdon	5.1	423	450
Hounslow	5.0	407	432
Islington	1.2	102	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	384	407
Redbridge	1.8	151	160
Richmond	1.8	148	157
Southwark	1.8	151	160
Sutton	2.6	210	224
Tower Hamlets	2.4	195	207
Waltham Forest	2.4	199	211
Wandsworth	3.2	264	280
City of Westminster	2.3	188	199
London total	100.0	8,216	8,726

* Apportionment is per cent share of London's total waste to be managed by borough

Table 9.3 - Projected exports of Household and Commercial & Industrial waste from London (000's tonnes)

	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.

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** (see Table 9.3).

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.**

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
- it relates to production of solid recovered fuel (SRF), or it is high-quality refuse-derived fuel (RDF) meeting the Defra RDF definition as a minimum[131]
- it is sorted or bulked for re-use (including repair and re-manufacture) reprocessing or recycling (including anaerobic digestion)
- It is reused, recycled or reprocessed.

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

131 http://www.sita.co.uk/services-and-products/our-products/rdf-srf for an explanation of the differences between SRF and RDF.

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 and Commercial & 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 and Commercial & Industrial waste that each borough should plan for, and these apportionments are set out in Table 9.2. Part B.2 of Policy SI8 Waste capacity and net waste self-sufficiency 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.

9.8.7 Boroughs should examine in detail **how capacity can be delivered at the local level** through site allocations in Development Plans to meet their apportionments, and should aim to meet their waste apportionment as a minimum. However, this may not always be possible and boroughs will need to agree the transfer of apportioned waste. Boroughs should identify suitable additional sites for waste including waste transfer sites where practicable. 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. Mayoral Development Corporations should cooperate with boroughs to ensure that the boroughs' apportionment requirements are met. This could be widened to cover boroughs in the relevant waste disposal authority. 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.

9.8.8 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 existing waste management sites. Large-scale redevelopment opportunities and redevelopment proposals should incorporate waste management facilities

within them. The London Waste Map[132] shows the locations of London's permitted waste facilities and sites that may be suitable for waste facility location.

9.8.9 As noted above waste flows across boundaries and London exported 3.4mt of Household and Commercial & 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** over the decade to 2026. Table 9.3 is included to help neighbouring authorities plan for London's waste exports.

9.8.10 Tables 9.1, 9.2 and 9.3 only refer to Household and Commercial and Industrial Waste, not Construction, Demolition and Excavation (CD&E) 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 data see the SLR consulting report (task 2) (May 2017).

9.8.11 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[133]. 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.

9.8.12 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.

9.8.13 Examples of the **'demonstrable steps' required under part D3 of** Policy SI8 Waste capacity and net waste self-sufficiency are:

132 https://maps.london.gov.uk/webmaps/waste/

133 http://www.london.gov.uk/priorities/environment/putting-waste-good-use/making-the-most-of-waste

- 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.

9.8.14 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.

9.8.15 In 2015 around 324,000 tonnes of **hazardous waste** was produced in London. 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.

9.8.16 **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.

9.8.17 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 G of Policy D4 Housing quality and standards.

Policy SI9 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 at least meet, and should exceed, the maximum achievable throughput of the site proposed to be lost.

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 **waste site release** should be part of a plan-led process, rather than 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 three years should be used.

9.9.3 Policy SI8 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 without capacity re-provision

if it can be demonstrated that there is sufficient capacity available elsewhere at appropriate sites over the Plan period. In such cases, sites could be released for other land uses.

Policy SI10 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
2) extracting land-won aggregates within London
3) importing aggregates to London by sustainable transport modes
4) meeting the target of 95 per cent recycling/re-use of construction, demolition and excavation waste by 2020 and recycling 50 per cent of that waste as aggregates by 2020.

B Development Plans should 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:

1) at least 1.75 mt to London Borough of Havering
2) at least 0.7 mt to London Borough of Redbridge
3) at least 1.75 mt to London Borough of Hillingdon
4) at least 0.7 mt to London Borough of Hounslow.

C All Mineral Planning Authorities in London should identify and safeguard aggregate resources in Development Plans, including aggregate recycling facilities.

D To reduce the environmental impact of aggregates, Development Plans should:

1) ensure that appropriate use is made of planning conditions dealing with aftercare, restoration and re-use of minerals sites following extraction, with particular emphasis on promoting green infrastructure, especially biodiversity
2) safeguard wharves and/or railheads with existing or potential capacity for aggregate distribution and/or processing to minimise

the movement of aggregates by road and maximise the movement of aggregates by sustainable modes.

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, and recycled materials. 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 figure** (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 the policy above. There remains some potential for extraction beyond the four boroughs identified in Policy SI10 Aggregates, including within the Lee Valley, and boroughs with aggregates resources should consider extraction opportunities.

9.10.3 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 the best and most local use of materials that can be extracted in London. The **re-use/recycling** of building materials and aggregates is a significant and well established component of the circular economy advocated in Policy SI7 Reducing waste and supporting the circular economy and reduces the demand for natural materials.

9.10.4 Boroughs should protect existing, planned and potential **sites for aggregate extraction and transportation**. Existing and future wharf capacity is essential, especially for transporting marine-dredged aggregates, and should be protected in accordance with Policy SI15 Water transport. 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 protect them.

9.10.5 **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.

9.10.6 Mineral Planning Authorities are required to prepare an annual **Local Aggregates Assessment** (LAA). It is not reasonable to expect boroughs without mineral resources or aggregate facilities to produce their own LAAs, so the Mayor will continue to prepare a joint London-wide LAA to supplement individual LAAs from boroughs with resources and facilities.

Policy SI11 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"[134]. 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

134 The Jurassic shales of the Weald Basin: geology and shale oil and shale gas resource estimation. British Geological Survey for DECC 2014 https://www.ogauthority.co.uk/media/2773/bgs_decc_jurassicwealdshale_study_2014_main_report.pdf

- 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

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[135]. 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 SI12 Flood risk management

A Current and expected flood risk from all sources 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 Surface Water Management Plan, where necessary, to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.

C Development proposals which require specific flood risk assessments 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

135 Community Engagement Charter – oil and gas from unconventional reservoirs, UKCOOG 2013 http://www.ukoog.org.uk/community/charter

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.

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. Where possible, development proposals should set permanent built development back from flood defences to allow for any foreseeable future upgrades.

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 register of flood risk. They identify areas of flood risk to help inform appropriate locations for development. 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 Environment Agency's **Thames Estuary 2100 Plan** (TE2100) focuses on 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 Lead Local Flood 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. 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 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.

9.12.7 Development **adjacent to flood defences** will be required to protect the integrity of existing flood defences. Wherever possible it should be set back from the banks of watercourses and flood defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost-effective way.

Policy SI13 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.

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 in line with the following drainage hierarchy:

1) rainwater harvesting (including a combination of green and blue roofs)
2) infiltration techniques and green roofs
3) rainwater attenuation in open water features for gradual release
4) rainwater discharge direct to a watercourse (unless not appropriate)

5) rainwater attenuation above ground (including blue roofs)

6) rainwater attenuation below ground[136]

7) rainwater discharge to a surface water sewer or drain

8) rainwater discharge to a combined sewer.

C Development proposals for impermeable paving should be refused where appropriate, including on small surfaces such as front gardens and driveways.

D Drainage should be designed and implemented in ways that address issues of water use efficiency, river water quality, biodiversity, amenity and recreation.

136 The benefit of attenuation above compared to below ground or in a basement is that pumping is normally not required to empty the attenuation tank.

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 maintenance arrangements. **Local Flood Risk Management Strategies** and **Surface Water Management Plans** should ensure they address flooding from sewers, drains and groundwater, and run-off from land 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[137] 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 and there should be a preference for green over grey features. 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

137 The runoff that would occur from a site in undeveloped state.

Thames or a dock. This should include suitable pollution prevention measures. 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.

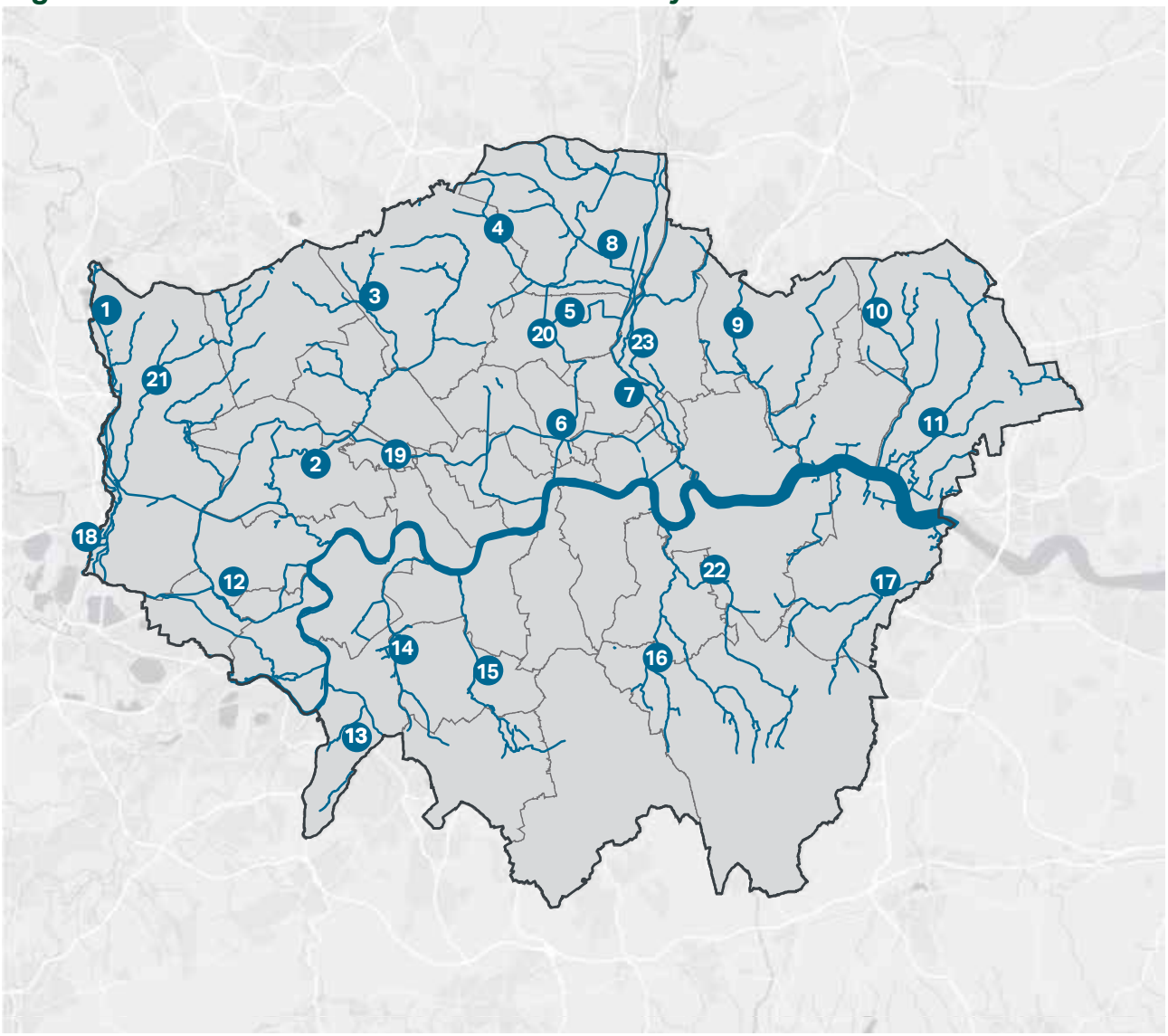
Policy SI14 Waterways – strategic role

A 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.

B 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. Boroughs are encouraged to work together on policies and to develop and update joint Thames Strategies that should support individual Development Plans.

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** is of strategic importance for London. Every London borough contains some waterways – 17 border the Thames and 15 contain canals (see Figure 9.6).

Figure 9.6 - London's Network of Waterways



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

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 sites, landscapes, views, cultural and community activities; and drainage, flood and water management functions. As such, they provide environmental, economic and health and wellbeing benefits for Londoners. They 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.

9.14.3 The **Thames and London Waterways Forum**[138] 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.

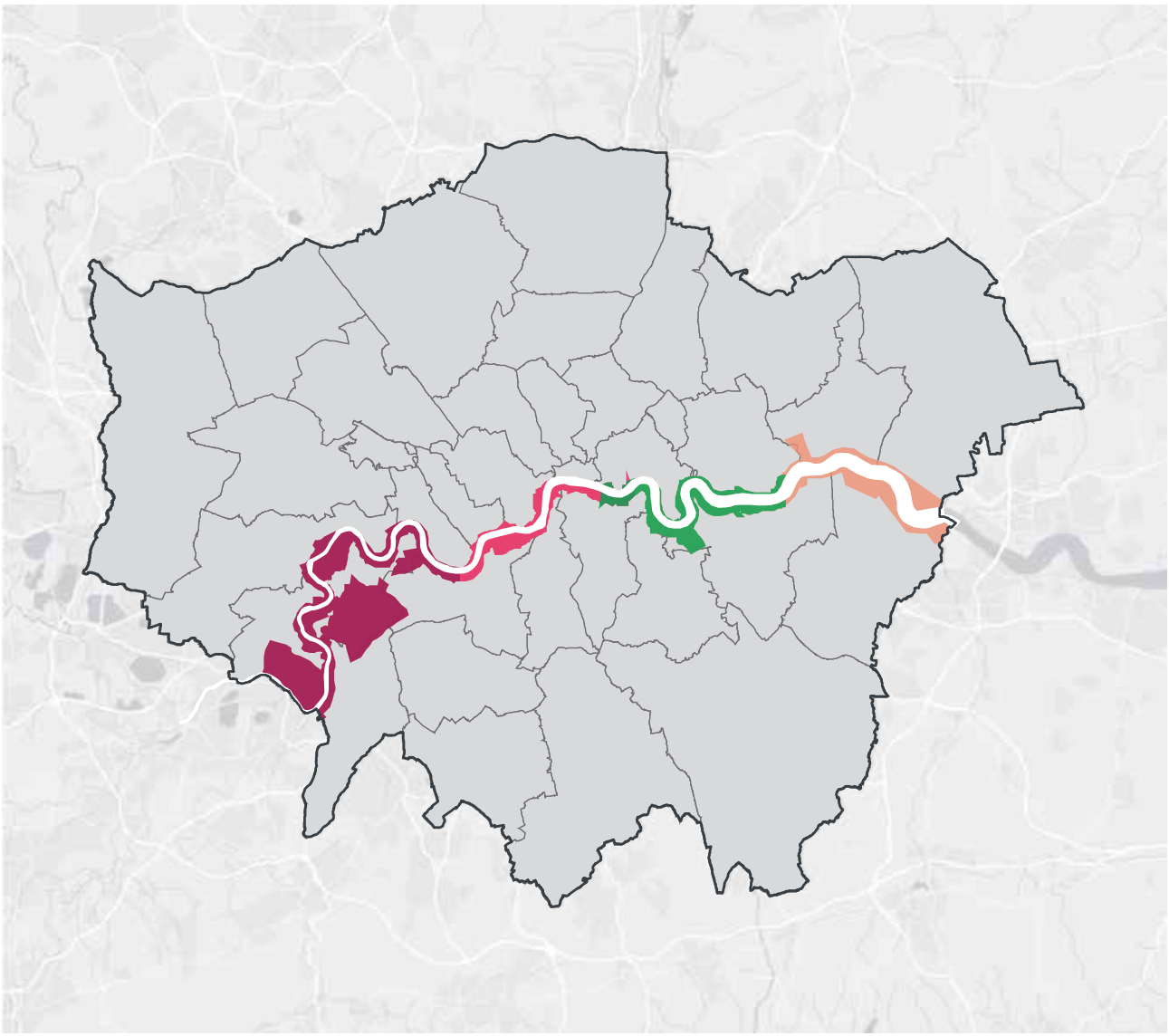
9.14.4 The River Thames is a strategically-important and iconic feature of London. Its character changes on its way through London. Where **Thames Policy Areas** (TPAs) are not defined in Development Plans, the boundaries defined in Figure 9.7 apply. Within TPAs, lower-height thresholds for referable planning applications apply (25m compared to 30m elsewhere).

9.14.5 Setting **the boundary of TPAs** should be done in consultation with neighbouring authorities, including those across the river. In defining these boundaries, boroughs should 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.

138 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

Contains OS data © Crown copyright and database right (2017)

9.14.6 **Joint Thames Strategies** should cover:

- the local character of the river
- water-based passenger and freight transport nodes
- development sites and regeneration opportunities
- opportunities for environmental and urban design improvements
- sites of ecological 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
- indicative flood risk and water quality.

9.14.7 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 central section of the Thames (Chelsea-Tower Bridge).

9.14.8 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.

9.14.9 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[139]. It covers the covers the coastline from Felixstowe to Dover including the tidal Thames. Development Plans and development proposals should take account of these plans.

139 https://www.gov.uk/government/collections/south-east-marine-plan

Policy SI15 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. 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 by river 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 capacity and operability of the 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 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 on wharves which are currently not handling freight by water, will be supported.

G Development proposals that include the provision of a water freight use on a safeguarded wharf, with other land uses above or alongside, will need to ensure 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 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** promotes 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.

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 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.

9.15.8 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.

9.15.9 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 SI16 Waterways – use and enjoyment

A Development Plans should protect and enhance waterway infrastructure to enable water-dependent uses.

B 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.

C Development proposals for cultural, educational and community facilities and events should be supported and promoted, but should take into consideration the protection and other uses of the waterways.

D New mooring facilities should be:

1) supported as part of development proposals, but should be off-line from main navigation routes, in basins or docks, unless there are no negative impacts on navigation

2) managed in a way that respects the character of the waterways.

E Major development schemes adjacent to waterways should consider the provision of new moorings.

F Existing access points to waterways (including slipways and historic steps) and alongside waterways (including paths) should be protected and enhanced.

G Development proposals along waterways should explore opportunities for new, extended, improved and inclusive access infrastructure.

H Development proposals should improve and expand the Thames Path and the towpaths and provide better linkages to the transport network. This will require collaboration with relevant partners including the London boroughs, the PLA and 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 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 and cycleways (piers, wharves and boatyards are addressed in Policy SI15 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 There has been a significant increase in the number of boats on London's waterways (from 2,000 in 2010 to 5,000 in 2016), with a notable increase in central and eastern parts of London's canal network. There is a **deficit of residential, leisure, visitor and commercial moorings** to meet the increase in demand. The Canal and River Trust is producing a London Mooring Strategy which will provide an overview of the number of people living on boats on the canal network. It will identify zones for potential additional moorings. Some community-based projects to create residential moorings may be considered as community-led housing (part A.4 of Policy H2 Small sites). In addition, a number of creative businesses such as artists' studios and post-production facilities are located on boats.

9.16.3 Historic steps and slipways to the Thames foreshore are vital for enabling access for 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. 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.

9.16.4 Complementing development proposals for cultural facilities and events, the Mayor's **Cultural Strategy for the River** aims to increase Londoners' engagement with the river, including an increase in night-time use and engagement with under-used areas. It also provides information on the heritage and importance of the River Thames to London.

9.16.5 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 SI17 Protecting London's waterways

A Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect the foreshore and increase the heritage and habitats value, should be supported if appropriate. Development proposals to impound and constrain waterways should be refused.

B Development proposals should support and improve the protection of the distinct open character and heritage of waterways.

C Development proposals into the waterways, including permanently moored vessels and development into the waterways should generally only be supported for water-related uses.

D Development proposals along London's canal network, docks, other rivers and water space (such as reservoirs, lakes and ponds) should respect their local character and environment and should contribute to their accessibility and active water-related uses. Development Plans should identify opportunities for increasing local distinctiveness.

E On-shore power at water transport facilities should be provided 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[140], and the Catchment Partnerships[141] 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.

140 http://www.therrc.co.uk/lrap/lplan.pdf

141 https://www.thames21.org.uk/catchment-partnerships-in-london/

9.17.2 Generally, permanently-moored vessels and **development into waterways** should only be permitted for water-related uses. However, uses such as bars and restaurants (for example ancillary to a passenger pier), and improved access to or along waterways and related public realm, can 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 and use of waterways are not compromised.

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 Transport for London and the PLA, along with appropriate measures and investment to minimise impact. This includes the requirement in this policy to provide 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



Policy T1 Strategic approach to transport

A Development Plans and development proposals should support:

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, London cannot continue to grow sustainably.

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 servicing and delivery trips on the road network including through consolidation. He will promote **efficient and sustainable essential freight** functions, including by road, rail, water and, for shorter distances, bicycle.

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.

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

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 and public transport travel. 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 and welcoming to all, so that every Londoner can be active every day, creating a healthier city, inclusive of 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 and delivering services on London's streets is lessened. To deliver the Healthy Streets Approach, changes are required at 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 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. Measures which improve Londoners' experience of individual streets, including greening, to encourage them to live active lives should be embedded within new development.

10.2.5 How the city's streets are planned and used at a larger scale also has a big impact on individual streets around London. 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 and deliveries. 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. **Strategic-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. New developments and public realm schemes should deliver improvements against the Healthy Streets Indicators.

Figure 10.1 - The Ten Healthy Streets Indicators



Source: Lucy Saunders

10.2.8 The Mayor has a long-term vision to reduce danger on the streets 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.

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 transport or 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 and route alignments, as well as supporting infrastructure, in order to provide transport functions and planned changes to capacity, including proposals identified in Table 10.1

3) safeguarding the Walk London Network, protecting access to and improving the Thames Path and, where relevant, improving its alignment with the Thames.

C Development proposals that do not provide adequate protection for the schemes outlined in Table 10.1 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, priority should be given to delivering upgrades to Underground lines, securing 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.

Table 10.1 - Indicative list of transport schemes

Scheme	Cost	Timescale
Healthy Streets and active travel		
Accessibility and inclusivity embedded in the 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)	med/high	2022-2041
Street tree 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 Oxford Street	low	2017-2022
Transformation of Parliament Square (subject to further assessment)	low	2020s
ULEZ in central London	medium	2017-2020

Scheme	Cost	Timescale
ULEZ in inner London	low	2020-2030
ULEZ London-wide for buses, coaches and HGVs	low	2020-2030
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
Walk and cycle bridge between Battersea and Fulham	low	2017-2020
Walk and cycle bridge between Nine Elms and Pimlico	low	2020-2030
A new river crossing for pedestrians and cyclists 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
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: retrofitting 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	2017-2020
Bus priority network and supporting infrastructure	medium	2017-2030
Bus transit pilots in Opportunity Areas	low	2020-2041
Coach hub(s) re-provision	medium	2020-2030
Crossrail 2 (including West Anglia Main Line 4-tracking)	high	2020-2041

Scheme	Cost	Timescale
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	2017-2020
Elizabeth line extension east of Abbey Wood	high	2020-2041
Heathrow Airport Southern Access (required for airport expansion)	medium	2020-2041
Heathrow Airport Western Access (required for airport expansion)	medium	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 extensions (subject to further assessment)	medium	2030-2041
London Overground frequency upgrades (network-wide)	high	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
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	medium	2017-2041
Night Overground	low	2017-2020

Scheme	Cost	Timescale
Night-time services on the DLR	low	2020-2030
Night Tube extensions	low	2017-2030
Northern Line Extension	high	2017-2020
River crossing at Gallions 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
Thameslink Programme	high	2017-2020
Tram extension to Sutton (subject to further assessment)	medium	2020-2030
Tram upgrades	medium	2017-2041
Walk and cycle ferry between North Greenwich and Canary Wharf (subject to further assessment)	low	2017-2020

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 **The Elizabeth Line**, due to open in 2019, will increase capacity within central London by about ten per cent, relieving crowding on the Tube

network, reducing journey times from east and west London to central London and the Isle of Dogs, and reducing congestion at Paddington, Liverpool Street and in the West End. This will mean that an extra 1.5 million people will be within 45 minutes' commuting distance of central London. The Elizabeth Line has been designed to allow for future increases in capacity, given the expected demand associated with an increasing population and growing employment in the areas it serves.

10.3.4 **Crossrail 2** is essential to London's future. Linking National Rail networks in Surrey and Hertfordshire via new tunnels and stations between Wimbledon and Tottenham Hale, this major new line will provide capacity for 270,000 people to travel into and across central London each morning. The additional capacity will also help to reduce some of the crowding on the rest of the network that threatens to bring some major stations to a standstill. It will also unlock around 200,000 new homes, and support up to 200,000 new jobs. Working with partners, the Mayor aims to open Crossrail 2 by 2033.

10.3.5 **Extending the Bakerloo Line** is also necessary to provide extra capacity on the Tube in south east London, enabling capacity for up to for 65,000 passenger journeys during the morning and evening peak. Increasing connectivity and reducing journey times will enable the Bakerloo Line Extension to support more than 25,000 new homes and 5,000 jobs.

10.3.6 **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 Transport assessments should be submitted with development proposals to ensure that any 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 in accordance with relevant Transport for London guidance[142].

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 any 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 may 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.

142 https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications

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.

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[143].

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 Ideally, 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**.

143 https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications

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 in accordance with the minimum standards set out in Table 10.2 and Figure 10.2, and should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards[144].

B 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.

C 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.

D Where flexible commercial uses are proposed and exact uses are not determined at the point of application, the highest potential applicable cycle parking standard should be applied.

E Where the final land use of a development is not determined at the point of application, the highest potential applicable cycle parking standard should be applied.

F A minimum of two short-stay and two long-stay cycle parking spaces must be provided for all land uses in all locations with the exception of

144 The London Cycling Design Standards can be found in TfL's online Streets Tookit at https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2

Class C3-C4 uses and Class A uses where the size threshold specified in Table 10.2 has not been met.

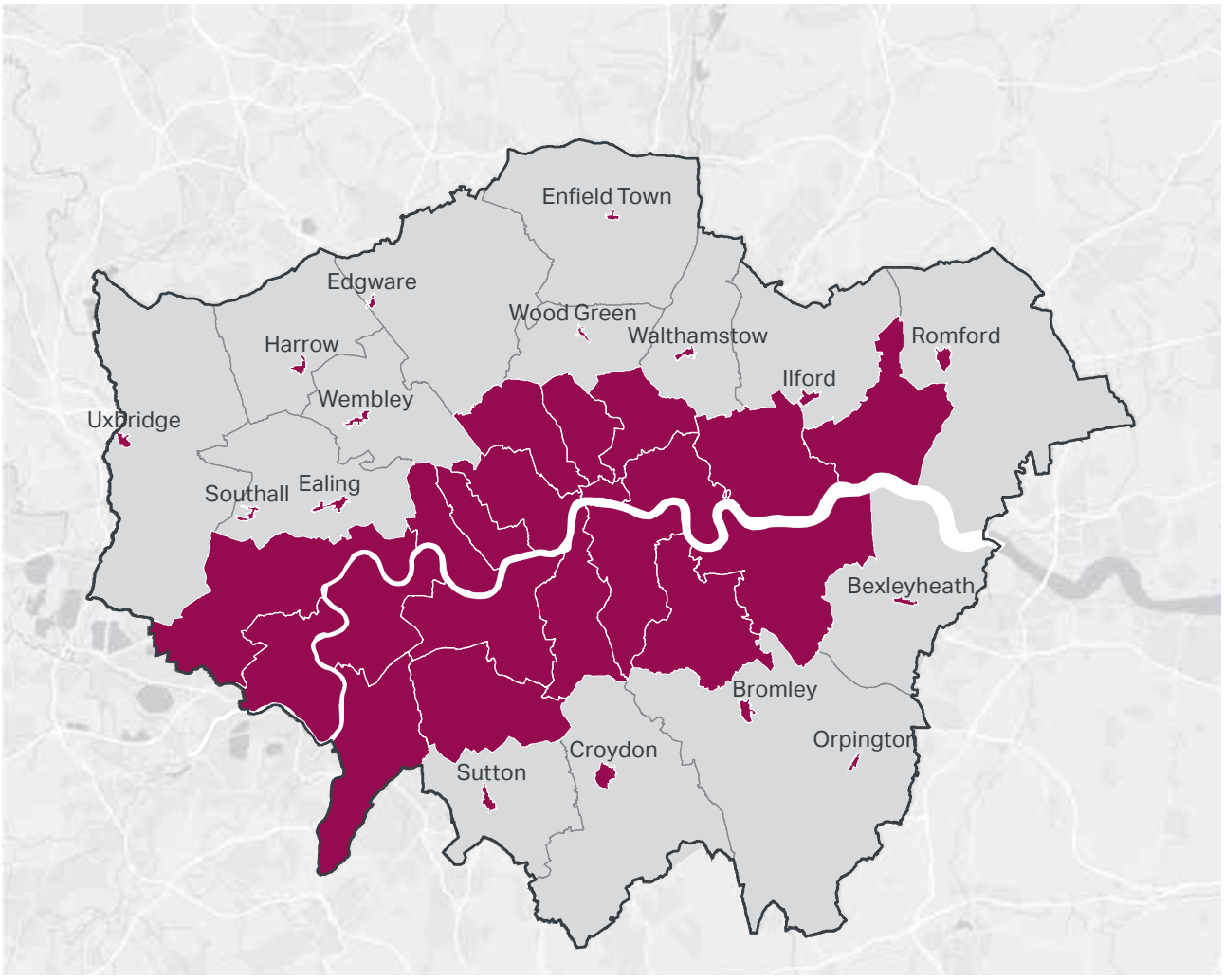
Table 10.2 - Minimum cycle parking standards

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
A1	Food retail	From a threshold of 100 sqm: 1 space per 175 sqm gross external area (GEA)	From a threshold of 100 sqm: areas with higher cycle parking standards (see Figure 10.2): 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	From a threshold of 100 sqm: first 1,000 sqm: 1 space per 250 sqm Thereafter: 1 space per 1,000 sqm (GEA)	From a threshold of 100sqm: areas with higher cycle parking standards (see Figure 10.2): First 1,000 sqm: 1 space per 60 sqm; thereafter: 1 space per 500 sqm (GEA) Rest of London: first 1,000 sqm: 1 space per 125 sqm; thereafter: 1 space per 1,000 sqm (GEA)
A2 - A5	Financial / professional services; cafés & restaurants; drinking establishments; takeaways	From a threshold of 100 sqm: 1 space per 175 sqm (GEA)	From a threshold of 100 sqm: areas with higher cycle parking standards (see Figure 10.2): 1 space per 20 sqm (GEA) Rest of London: 1 space per 40 sqm (GEA)

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
B1	Business offices	Areas with higher cycle parking standards (see Figure 10.2): 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 1,000 sqm (GEA)
B2-B8	General industrial, storage or distribution	1 space per 500 sqm (GEA)	1 space per 1,000 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
C2	Care homes / secure accommodation	1 space per 5 FTE staff	1 space per 20 bedrooms
C3-C4	Dwellings (all)	1 space per studio 1.5 spaces per 1 bedroom unit 2 spaces per all other dwellings	1 space per 40 units

Use Class		Long-stay (e.g. for residents or employees)	Short-stay (e.g. for visitors or customers)
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	Other (e.g. cinema, bingo, etc.)	1 space per 8 FTE staff	1 per 30 seats
	Sports (e.g. sports hall, swimming, gymnasium, etc.)	1 space per 8 FTE staff	1 space per 100 sqm (GEA)
Sui generis		As per most relevant other standard e.g. casino and theatre = D2, room in large-scale purpose-built shared living or student accommodation = studio C3.	
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 Future growth, though a step-change in provision is expected, especially at termini, in order to meet the Mayor's mode share target.	

Figure 10.2 - Areas 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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10.5.1 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 10.2 (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.

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 boroughs identified on Figure 10.2 are thus set at twice the level as elsewhere – though the Mayor will support other boroughs adopting these **higher standards** for defined areas through their Development Plan documents (such as existing Mini-Hollands, and Liveable Neighbourhoods or Opportunity Areas).

10.5.4 TfL have identified trips to outer London Metropolitan and Major town centres as having high potential for a switch to cycling. These higher standards should also apply in these locations 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 cycle parking provision 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 not an acceptable alternative to conventional cycle parking, as these cycles are only used by a minority of cycle owners, tend to be less affordable and can present difficulties for some users. 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').

C 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.

D 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.

E Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles.

F Adequate provision should be made for efficient deliveries and servicing.

G A Car Park 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 car parking management and car parking design.

H Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. 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 land uses in any part of London.

I Where sites are redeveloped, existing parking provision should be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.

10.6.1 To manage London's road network and ensure that people and businesses can move about the city as the population grows, new parking provision must be carefully controlled. The dominance of vehicles on streets is a significant barrier to walking and cycling and reduces the appeal of streets as public places. **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.

10.6.2 **Maximum standards for car parking** take account of PTAL[145] as well as London Plan spatial designations and land use. 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

145 See the Glossary for an explanation of PTAL.

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 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.

10.6.4 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, PTAL and future levels of public transport, walking and cycling connectivity.

10.6.5 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.

10.6.6 The general principles outlined in paragraphs 10.6.3 to 10.6.5 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.

10.6.7 **Motorcycle parking** will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all land uses.

10.6.8 In order to meet the Mayor's target for carbon-free travel by 2050, all operational parking must provide **infrastructure for electric or other Ultra-Low Emission vehicles**.

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.

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 at least one designated disabled persons parking bay per dwelling for three per cent of dwellings is available from the outset
2) demonstrate on plan and as part of the Car Parking Design and Management Plan, how the remaining bays to a total of one per dwelling for ten per cent of dwellings can be requested and provided when required as designated disabled persons parking in the future. If disabled persons parking provision is not sufficient, spaces should be provided when needed either upon first occupation of the development or in the future.

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 BS8300 vol. 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	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	Car-free
Inner London PTAL 3	Up to 0.25 spaces per unit
Inner London PTAL 2 Outer London PTAL 4 Outer London Opportunity Areas	Up to 0.5 spaces per unit
Inner London PTAL 0 – 1 Outer London PTAL 3	Up to 0.75 spaces per unit
Outer London PTAL 2	Up to 1 space per unit
Outer London PTAL 0 – 1	Up to 1.5 spaces per unit[1]

[1] Where small units (generally studios and one bedroom flats) make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit

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 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 **Car Parking Design and Management Plans** 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 could be created and what, if any, provision of visitor parking for disabled residents is available. At no time should any space marked on plan for future disabled persons parking be used for general parking. This does not apply when it is proposed to convert an existing on-street parking bay.

10.6.11 In implementing this policy, if three per cent of a scheme is less than one space, this should be rounded up to one.

10.6.12 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.

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 standards for Use Classes Order B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to these office parking standards, take account of the significantly lower employment density in such developments, and consider a degree of flexibility to reflect different trip-generating characteristics.

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 Car Park 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 sqm gross internal area (GIA)
Outer London	Up to 1 space per 100 sqm (GIA)
Outer London locations identified through a Development Plan Document where more generous standards apply	Up to 1 space per 50 sqm (GIA)

10.6.13 **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.

10.6.14 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.

Policy T6.3 Retail parking

A The maximum parking standards set out in Table 10.5 should be applied to new retail development.

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.

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 sqm	Up to 1 space per 75 sqm gross internal area (GIA)
Rest of outer London	Up to 1 space per 50 sqm (GIA)

10.6.15 **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 cycleable, 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.

10.6.16 As with office parking, any provision that is made should be carefully managed so that is does not undermine the attractiveness of alternatives to the car.

Policy T6.4 Hotel and leisure uses parking

A In the CAZ and locations with a 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.

10.6.17 Hotels and leisure uses should be located in accessible locations to encourage walking and cycling and public transport use.

Policy T6.5 Non-residential disabled persons parking

A All non-residential elements of a development should provide at least one on or off-street disabled persons parking bay.

B Disabled persons parking should be provided in accordance with the levels set out in Table 10.6.

C 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.

D Designated bays should be marked up as disabled persons parking bays from the outset.

E Enlarged bays should be large enough to become disabled persons parking bays quickly and easily via the marking up of appropriate hatchings and 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.

F 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

	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 and leisure	6 per cent	4 per cent
Transport car parks	5 per cent	5 per cent
Religious buildings and crematoria	Minimum two spaces or 6 per cent, whichever is the greater	4 per cent
Sports facilities	Refer to Sports England Guidance	

10.6.18 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. Some Blue Badge parking should be provided even if no general parking is provided.

Policy T7 Freight and servicing

A Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight and servicing 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 and servicing at an area-wide level
3) seek to reduce emissions from freight, such as through 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.

B 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.

C Wharves and railheads involved in the distribution of aggregates should be safeguarded in line with Policy SI9 Safeguarded waste sites, Policy SI10 Aggregates and Policy SI5 Water infrastructure.

D Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.

E Development proposals for new consolidation and distribution facilities should be supported provided that they:

1) deliver mode shift from road to rail or water without adversely impacting passenger services (existing or planned) and without generating significant increases in street-based movements
2) reduce traffic volumes within London
3) reduce emissions from freight and servicing trips
4) enable sustainable last-mile movements, including by cycle and electric vehicle.

F Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. 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.

G 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.

H At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.

I Development proposals must adopt appropriate construction site design standards to 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.

10.7.1 An efficient freight network is necessary to support the function of the city. This policy seeks to facilitate **sustainable freight movement** 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 uses.

10.7.2 Currently many deliveries of non-urgent goods are made, unnecessarily, at congested times of the day. Lorries and vans are often less than half full and 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 and servicing activity were better consolidated. Regional **consolidation and distribution** centres at the edge of London are needed to serve the city and town centres, coupled with micro-distribution centres in central and inner London. The identification and protection of new sites for load consolidation at a range of scales in central, inner and outer London to aid sustainable last-mile consolidation is supported.

10.7.3 The Mayor will work with all relevant partners to improve the **safety and efficiency** of freight and servicing across London and support consolidation within and beyond London, as well as the retiming of movements to avoid peak hours. Where kerbside loading is required it should be designed to minimise the impact on other road users and pedestrians and seek to minimise the transfer distance from vehicle to destination.

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 Transport for London's guidance on **Construction Logistics and Delivery and Servicing Plans** should be adhered to when preparing planning applications. Plans should be developed in line with this guidance and

adopt the latest standards around safety and environmental performance of vehicles. The plans should be monitored and managed throughout the construction and operational phases of the development. TfL's freight tools including CLOCS (Construction Logistics and Community Safety) should be utilised to plan for and monitor site conditions to enable the use of vehicles with improved levels of direct vision. This should be demonstrated through a Site Assessment within a Construction Logistics Plan. Development proposals should demonstrate 'good' on-site ground conditions ratings or the mechanisms to reach this level.

Policy T8 Aviation

A The Mayor supports the case for additional aviation capacity in the south east of England providing it would meet London's passenger and freight needs, recognising that this is crucial to London's continuing prosperity and to maintaining its international competitiveness and world-city status.

B The Mayor supports the role of London's airports in enhancing London'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.

C The environmental impacts of aviation must be fully acknowledged and the aviation industry should fully meet its 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.

D 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.

E All airport expansion proposals 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.

F 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.

G Better use should be made of existing airport capacity, underpinned by upgraded passenger and freight facilities and improved surface access links, in particular rail.

H 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.

I Development of general and business aviation activity should generally be supported providing this would not lead to additional environmental harm, or impact on scheduled flight operations. Any significant shift in the mix of operations using an airport – for example introduction of scheduled flights at airports not generally offering such flights – should normally be refused.

J New heliports should be refused, other than for emergency services, and steps should be taken to reduce helicopters overflying London.

10.8.1 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.

10.8.2 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 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.

10.8.4 The Mayor recognises the **need for additional runway capacity** in the south east of England, but this should not be at the expense of London's

environment or the health of its residents. Hundreds of thousands of Londoners are already exposed to illegal levels of air pollution and significant noise pollution as a result of Heathrow airport's current operations and activities.

10.8.5 Airport expansion 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.

10.8.6 Airport expansion should not worsen existing **air quality** or contribute to exceedance of air quality limits, nor should it 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.

10.8.7 The Mayor will therefore strongly **oppose any expansion of Heathrow Airport** that would result in additional environmental harm. 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 could, in due course, make better use of its single runway if its flight cap were raised, subject to appropriate environmental mitigation and controls. London City Airport is working to upgrade its passenger facilities and enhance operational efficiency in conjunction with a reduction of its maximum permitted number of movements and the introduction of additional environmental mitigation measures. Luton and Southend airports are also undertaking substantial upgrades of their terminal facilities.

10.8.8 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.

10.8.9 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.

10.8.10 **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.

10.8.11 **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.

10.8.12 The **noise impacts from helicopters** can be considerable and the regime governing helicopter flights over London should be urgently reviewed. An updated regime should take full account of London's spatial growth and changes in technology to reduce noise impacts and safety risks.

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[146]. This would be levied from April 2019, and would replace 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. However, MCIL2 does need to be brought forward now to avoid a charging gap at the end of Crossrail 1 construction and to allow for early funding of the Crossrail 2 scheme. 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.

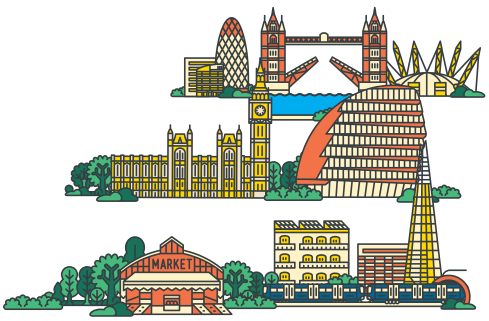
10.9.4 As part of individual development proposals, comprehensive assessment should both inform appropriate levels of mitigation and highlight opportunities for improvements. In some instances, this may include securing **planning obligations** and the development and implementation of strategies to improve public realm.

10.9.5 Alongside the development of 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.

146 https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/mayoral-community-infrastructure-levy

Chapter 11

Funding the London Plan



Overview

11.0.1 This is an ambitious Plan, and delivering it - particularly meeting London's housing need - 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. 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 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. 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 part D in developing their Community Infrastructure Levy Charging Schedule and Regulation 123 list.

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 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 are also subject to viability testing. 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) or where the value generated by a development would be exceptionally low.

11.1.5 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 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.

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 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.

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.

11.1.11 The London Infrastructure Plan 2050[147] 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[148]. 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.

147 London Infrastructure Plan GLA 2015

148 The method used to calculate required infrastructure investment in the London Infrastructure Plan 2050 is outlined in a paper prepared by Arup (2014).

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 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 £3.15 billion to support 90,000 affordable housing starts by 2021. 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 the Homes and Communities Agency, 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).

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 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[149]. 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.

149 London Finance Commission, 2017

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[150].

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.

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[151], supplemented by capital contributions from London boroughs. An indicative survey by the GLA across the academic years 2011/12 and

150 DfT., 2017. Transport Investment Strategy. DfT, London Finance Commission, 2017, Coelho, M & Ratnoo, V., 2014. Institute for Government; HM Treasury., 2014. National Infrastructure Plan 2014. HMT

151 Basic Need / Devolved Formula Capital

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[152].

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 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;

152 Arup, 2014, The cost of London's long-term infrastructure

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.

Digital Infrastructure

11.1.44 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 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

11.1.45 Green infrastructure comprises the network of parks, rivers and green spaces plus the green elements of the built environment such as street trees, green roofs and sustainable drainage systems[153]. The city's

153 Mayor's London Environment Strategy

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[154].

11.1.46 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.

11.1.47 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.

11.1.48 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.

11.1.49 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.

11.1.50 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 improving public health, enhancing resilience and providing more sustainable transport options.

11.1.51 Nevertheless, new funding streams will need to be identified in order to improve existing parks and green spaces and to create new green

154 Vivid Economics, 2017, Natural Capital Account for London's Public Green Spaces

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

11.1.52 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.

11.1.53 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[155]. 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.

11.1.54 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 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

11.1.55 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+ 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

155 London The Circular Economy Capital, London Waste and Recycling Board, 2015

source of significant employment growth and worth £42 billion to London's economy.

11.1.56 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.

11.1.57 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

11.1.58 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.

11.1.59 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.

11.1.60 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.

11.1.61 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.

11.1.62 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

11.1.63 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.

11.1.64 In recognition of this, and following an invitation for TfL to bring forward proposals for funding infrastructure projects from land value uplift, the Government has agreed to establish a joint task force (including the GLA and TfL) to explore the options for piloting a Development Rights Auction Model on a major infrastructure project in London.

11.1.65 There are also a range of other options for capturing land value uplift, and the Mayor will continue to explore all avenues for ensuring Londoners receive the vital infrastructure required to support growth.

Conclusion

11.1.66 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.

11.1.67 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



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 reported in 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 over time. 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 also monitors a range of other data beyond the new set of fewer, more strategic KPIs, compared to the previous 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 2030.
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 A comprehensive set of complementary and more detailed data and performance measures sits alongside the KPIs in the AMR. Some of the KPIs from the previous Plan are included and those time series are therefore retained. Specific other policy areas that are not covered by KPIs but where measuring trends – in particular on monitoring key planning-related social issues - is important include:

- delivery of homes and jobs in Opportunity Areas
- delivery of primary healthcare floorspace
- provision of school places
- delivery of floorspace for childcare facilities
- provision of sports facilities
- reduction of London's digital 'Not Spots'
- change in overall green cover
- delivery of sustainable drainage.

12.1.4 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.

12.1.5 The AMR is not the only tool to monitor London's performance. It is complemented by 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.

Annex 1

Town Centre Network

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 SD7 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.

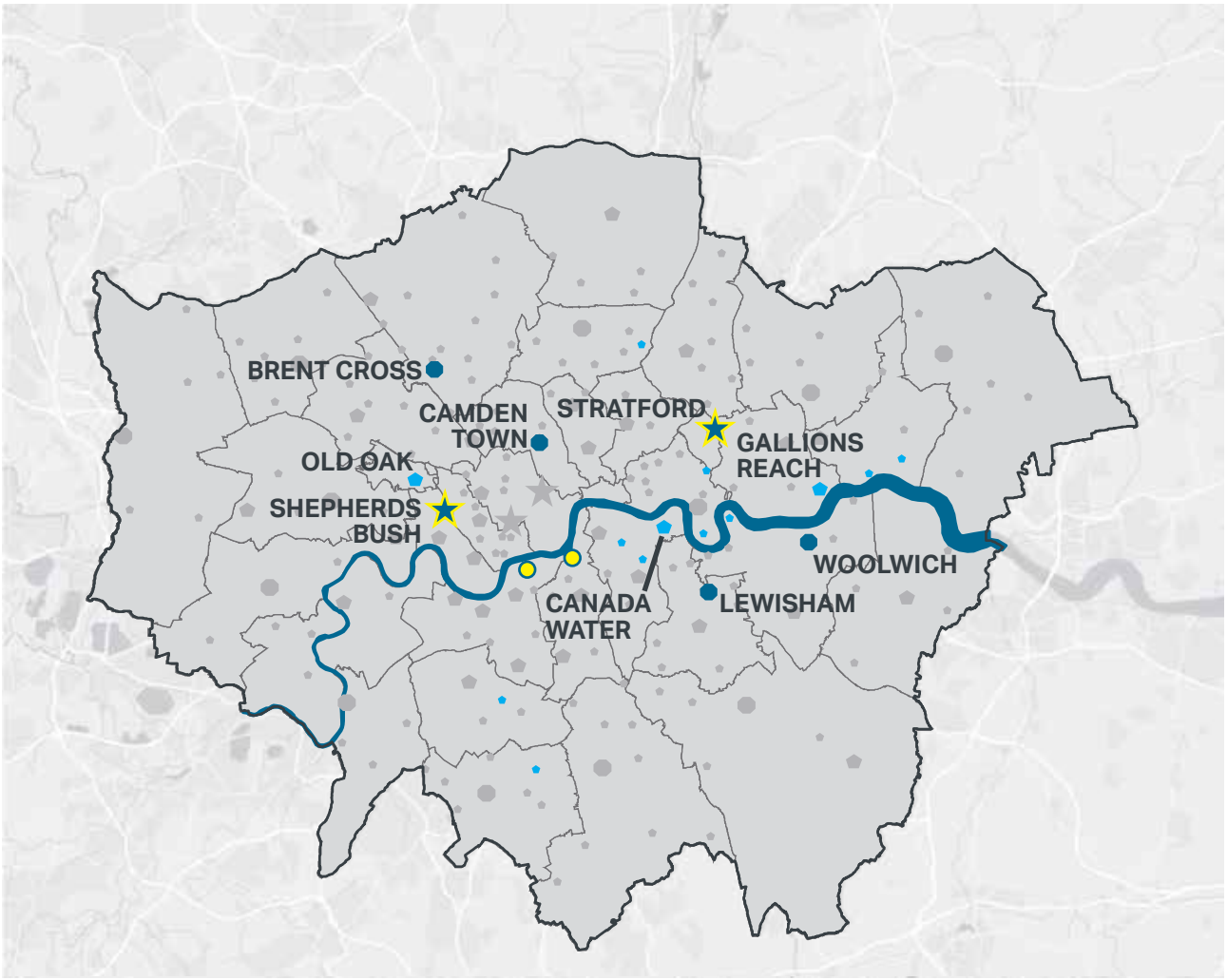
District centres – distributed more widely than Metropolitan and Major centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000–50,000 sqm of retail, leisure and service floorspace. Some District 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 centres.

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

Contains OS data © Crown copyright and database right (2017)

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 7.7 for details. They are classified into three categories:

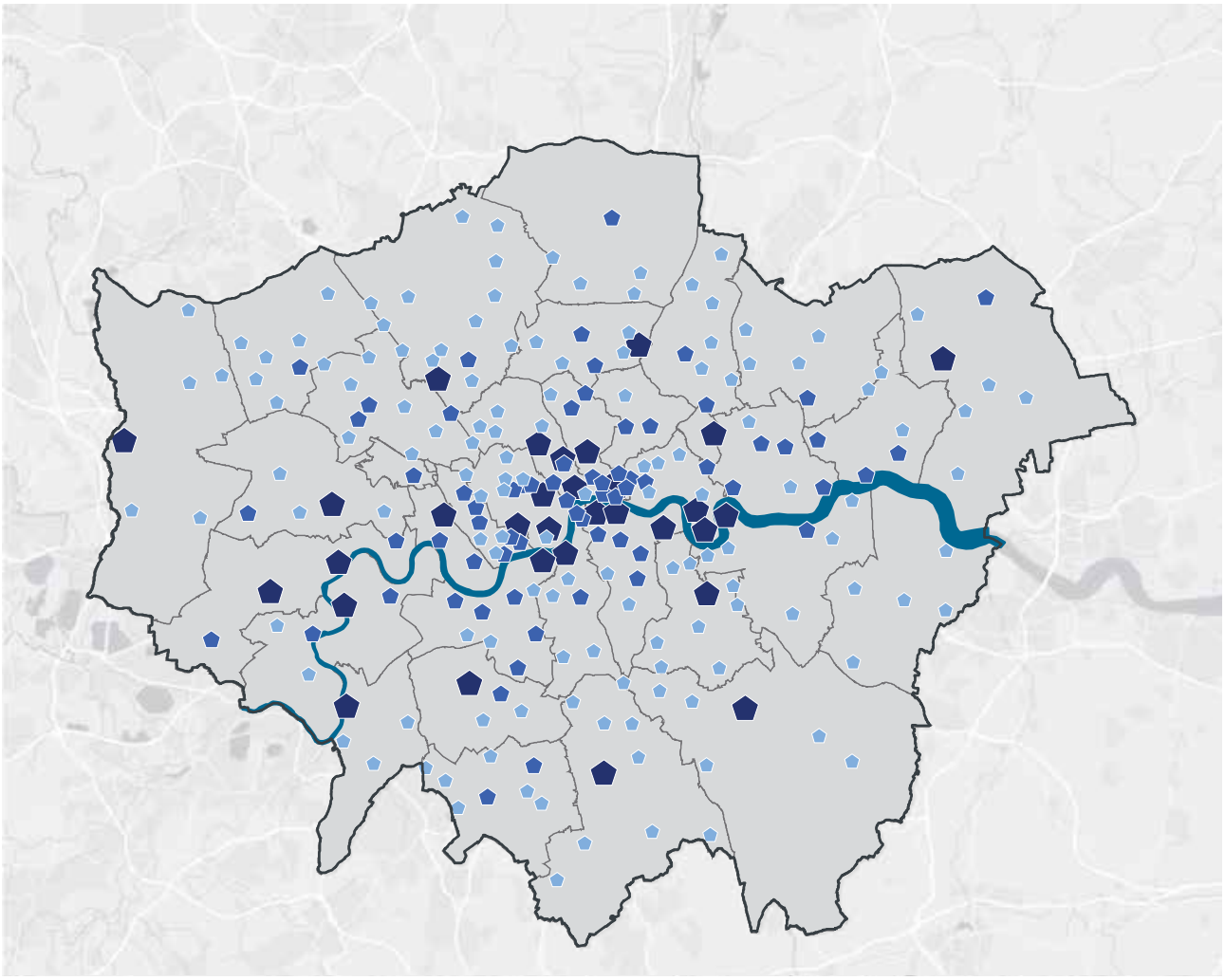
- NT1 – Areas of **international** or **national** significance
- NT2 – Areas of **regional** or **sub-regional** significance
- NT3 – Areas with **more than local** significance

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

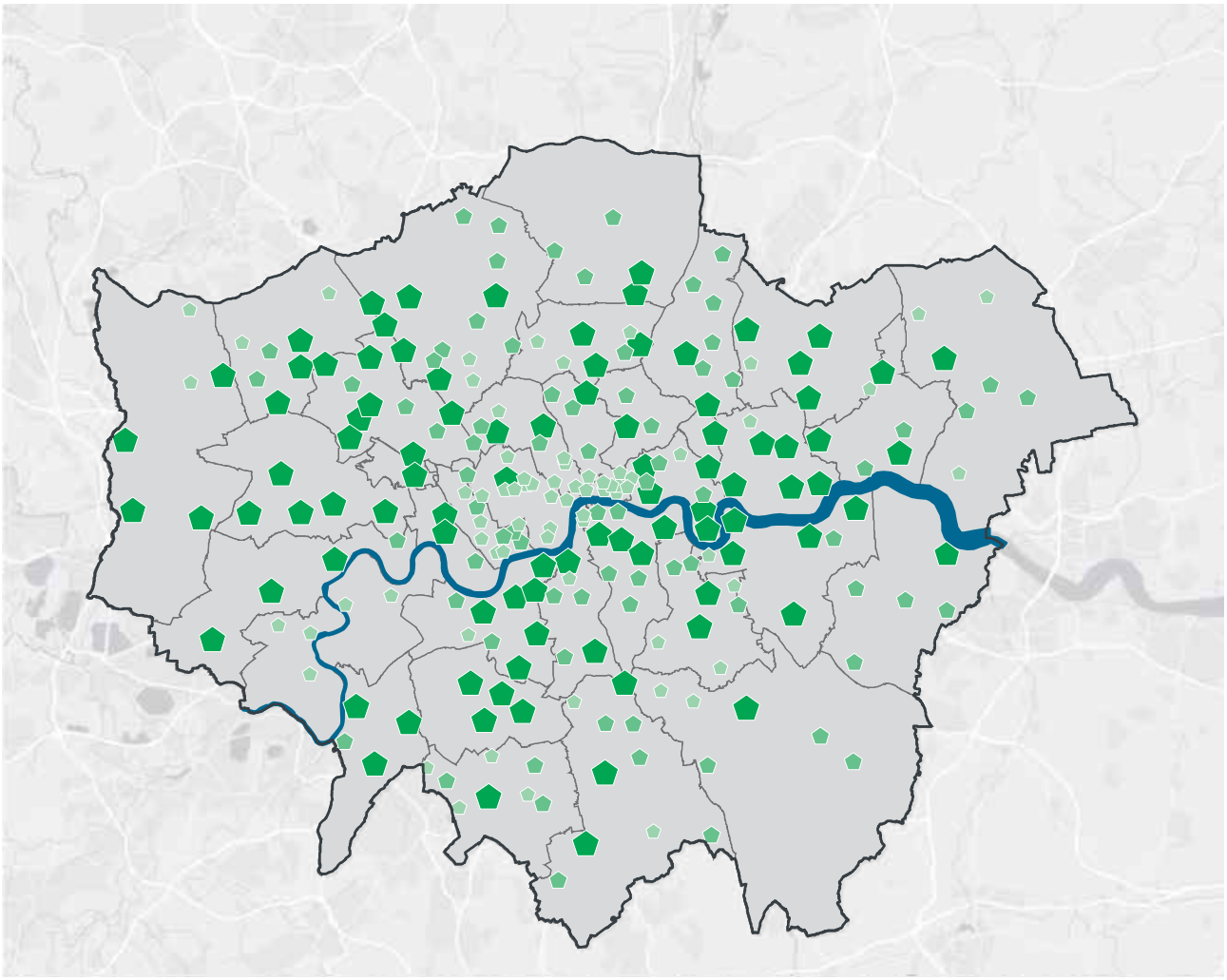
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Residential Growth Potential

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 SHLAA[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 SD8 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

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].

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.

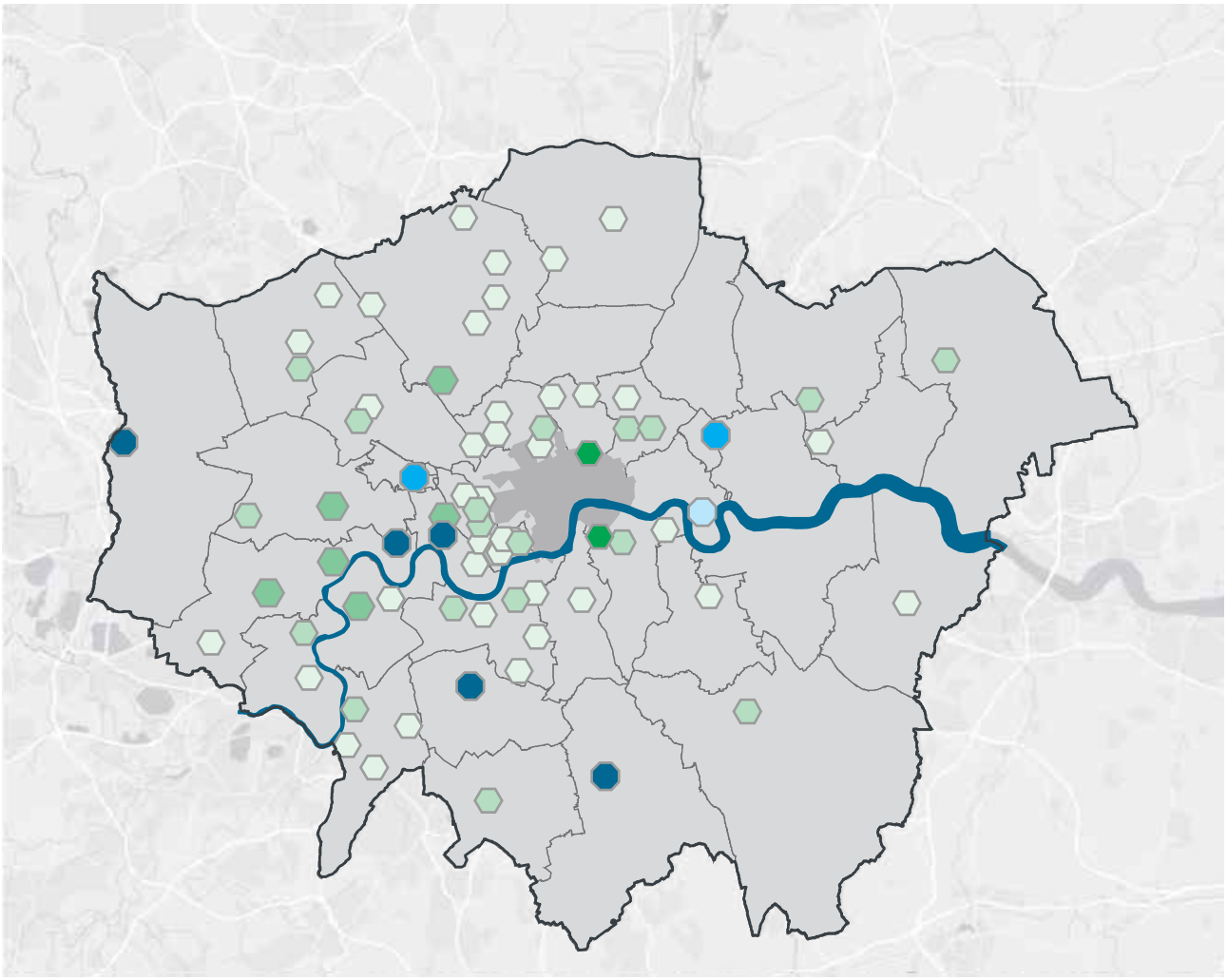
a. **Speculative office potential** – These centres have the capacity, demand and viability to accommodate new speculative office development.

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



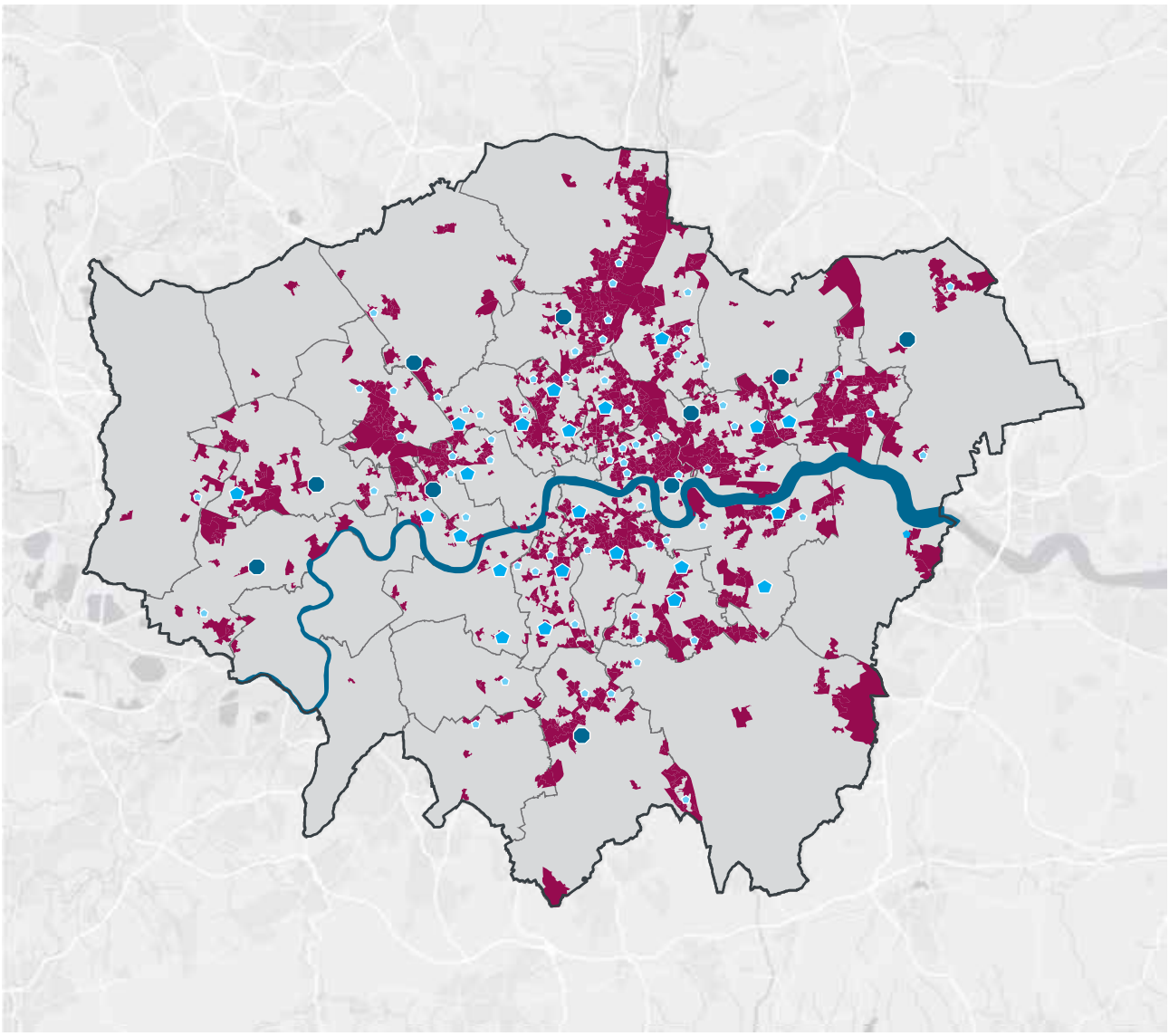
Town Centre Network
Office Guidelines

- A/ CAZ Satellite
- 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
Contains OS data © Crown copyright and database right (2017)

Table A1.1 - Town Centre Network

Ref	Centre	Borough	Network classification	Future potential network classification
1	West End	Westminster/ Camden	International	
2	Knightsbridge	Kensington & Chelsea/ Westminster	International	
3	Bromley	Bromley	Metropolitan	
4	Croydon	Croydon	Metropolitan	
5	Ealing	Ealing	Metropolitan	
6	Shepherds Bush	Hammersmith & Fulham	Metropolitan	International
7	Wood Green	Haringey	Metropolitan	
8	Harrow	Harrow	Metropolitan	
9	Romford	Havering	Metropolitan	
10	Uxbridge	Hillingdon	Metropolitan	
11	Hounslow	Hounslow	Metropolitan	
12	Kingston	Kingston	Metropolitan	
13	Stratford	Newham	Metropolitan	International
14	Ilford	Redbridge	Metropolitan	
15	Sutton	Sutton	Metropolitan	
16	Canary Wharf	Tower Hamlets	Metropolitan	
17	Barking	Barking & Dagenham	Major	
18	Edgware	Barnet/ Harrow	Major	
19	Bexleyheath	Bexley	Major	
20	Wembley	Brent	Major	
21	Kilburn	Brent/ Camden	Major	

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
NT1	High	Incremental	CAZ	
NT3	High	Incremental	CAZ	
NT2	High	High	B	
NT2	High	High	A	Yes
NT2	High	High	A/ B	Yes
NT2	High	High	A/ B	Yes
NT2	Medium	High		Yes
NT2	Medium	High	B	
NT2	High	High	B	Yes
NT2	High	High	A	
NT2	High	High	A/ B	Yes
NT2	High	High	B	
NT2	High	High	A/ future potential CAZ satellite	Yes
NT2	Medium	High	B	Yes
NT2	Medium	High	B	Yes
NT2	High	High	A/ CAZ satellite	
NT3	Medium	High	C	Yes
	Low	High	C	
NT3	Low	Medium	C	
NT1	Medium	High	B	
NT3	Low	Medium	C	Yes

Ref	Centre	Borough	Network classification	Future potential network classification
22	Orpington	Bromley	Major	
23	Camden Town	Camden	Major	Metropolitan
24	Southall	Ealing	Major	
25	Enfield Town	Enfield	Major	
26	Eltham	Greenwich	Major	
27	Woolwich	Greenwich	Major	Metropolitan
28	Dalston	Hackney	Major	
29	Fulham	Hammersmith & Fulham	Major	
30	Hammersmith	Hammersmith & Fulham	Major	
31	Chiswick	Hounslow	Major	
32	Angel	Islington	Major	
33	Nags Head	Islington	Major	
34	Kensington High Street	Kensington & Chelsea	Major	
35	King's Road (east)	Kensington & Chelsea	Major	
36	Brixton	Lambeth	Major	
37	Streatham	Lambeth	Major	
38	Catford	Lewisham	Major	
39	Lewisham	Lewisham	Major	Metropolitan
40	Wimbledon	Merton	Major	
41	East Ham	Newham	Major	
42	Richmond	Richmond	Major	
43	Elephant and Castle/ Walworth Road	Southwark	Major	
44	Peckham	Southwark	Major	

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
	Low	Medium		
NT1	High	Medium	C	Yes
	Medium	High	B	Yes
	Medium	Medium	C	
	Low	High		Yes
NT3	Medium	High		Yes
NT2	Medium	High	B	Yes
NT2	Medium	Medium	C	Yes
NT2	Medium	High	A	Yes
NT3	Medium	Medium	A	
NT2	High	Medium	A/ B and part CAZ	Yes
NT3	Medium	Medium		Yes
NT2	Medium	Incremental	B	
NT2	Medium	Medium	B	
NT2	Medium	Medium	C	Yes
NT3	Low	Medium		Yes
NT3	Low	High		Yes
NT3	High	High	C	Yes
NT2	High	High	A	
	Medium	High		Yes
NT2	High	Incremental	A/ B	
NT2	Medium	High	A/ B and part CAZ	Yes
NT2	Medium	Medium		Yes

Ref	Centre	Borough	Network classification	Future potential network classification
45	Walthamstow	Waltham Forest	Major	
46	Clapham Junction	Wandsworth	Major	
47	Putney	Wandsworth	Major	
48	Tooting	Wandsworth	Major	
49	Wandsworth	Wandsworth	Major	
50	Queensway/ Westbourne Grove	Westminster/ Kensington & Chelsea	Major	
51	Dagenham Heathway	Barking & Dagenham	District	
52	Green Lane	Barking & Dagenham/ Redbridge	District	
53	Chadwell Heath	Barking & Dagenham/ Redbridge	District	
54	Brent Street	Barnet	District	
55	Chipping Barnet	Barnet	District	
56	Church End, Finchley	Barnet	District	
57	East Finchley	Barnet	District	
58	Golders Green	Barnet	District	
59	Hendon Central	Barnet	District	
60	Mill Hill	Barnet	District	
61	New Barnet	Barnet	District	
62	North Finchley	Barnet	District	
63	Temple Fortune	Barnet	District	
64	Whetstone	Barnet	District	

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
NT2	Medium	High		Yes
NT2	Medium	High	B	Yes
NT3	Medium	Medium	B	
NT3	Medium	High	C	Yes
	Medium	High	C	
NT3	Low	Incremental	C	Yes
	Low	Medium		Yes
	Low	Incremental		Yes
	Low	High		
	Low	Medium		
NT3	Low	Medium	C	
	Low	Medium	C	
	Low	Medium		
	Low	Incremental		
	Low	Medium		
	Low	High		
	Low	Medium		
NT3	Low	High	C	
	Medium	Incremental		
	Low	Medium	C	

Ref	Centre	Borough	Network classification	Future potential network classification
65	Colindale/ The Hyde	Barnet/ Brent	District	
66	Cricklewood	Barnet/ Brent/ Camden	District	
67	Burnt Oak	Barnet/ Brent/ Harrow	District	
68	Crayford	Bexley	District	
69	Erith	Bexley	District	
70	Sidcup	Bexley	District	
71	Welling	Bexley	District	
72	Ealing Road	Brent	District	
73	Harlesden	Brent	District	
74	Neasden	Brent	District	
75	Preston Road	Brent	District	
76	Wembley Park	Brent	District	
77	Willesden Green	Brent	District	
78	Kingsbury	Brent/ Harrow	District	
79	Beckenham	Bromley	District	
80	Penge	Bromley	District	
81	Petts Wood	Bromley	District	
82	West Wickham	Bromley	District	
83	Hampstead	Camden	District	
84	Kentish Town	Camden	District	
85	Swiss Cottage/ Finchley Road	Camden	District	
86	West Hampstead	Camden	District	
87	Addiscombe	Croydon	District	
88	Coulsdon	Croydon	District	

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
	Low	High		
NT3	Medium	High		Yes
	Low	High		Yes
	Low	Medium		
	Low	High		Yes
	Low	Medium		
	Low	Medium		
	Low	High		
	Low	High		Yes
	Low	Medium		Yes
	Low	Medium		
NT3	Medium	High	C	Yes
	Low	Medium		
	Low	High		
NT3	Low	Incremental		
	Low	Incremental		Yes
	Low	Medium		
	Low	Medium		
NT3	Low	Incremental	C	
NT3	Low	High	B	Yes
NT2	Low	High	C	Yes
	Low	Medium		Yes
	Low	Medium		
	Low	Medium		

Ref	Centre	Borough	Network classification	Future potential network classification
89	New Addington	Croydon	District	
90	Purley	Croydon	District	
91	Selsdon	Croydon	District	
92	South Norwood	Croydon	District	
93	Thornton Heath	Croydon	District	
94	Norbury	Croydon/ Lambeth	District	
95	Upper Norwood/ Crystal Palace	Croydon/ Lambeth/ Bromley	District	
96	Acton	Ealing	District	
97	Greenford	Ealing	District	
98	Hanwell	Ealing	District	
99	Angel Edmonton	Enfield	District	
100	Edmonton Green	Enfield	District	
101	Palmers Green	Enfield	District	
102	Southgate	Enfield	District	
103	East Greenwich	Greenwich	District	
104	Greenwich West	Greenwich	District	
105	Plumstead	Greenwich	District	
106	Thamesmead	Greenwich	District	
107	Hackney Central	Hackney	District	
108	Stoke Newington	Hackney	District	
109	Bruce Grove/ Tottenham High Road	Haringey	District	
110	Crouch End	Haringey	District	
111	Green Lanes	Haringey	District	

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
	Low	Medium		Yes
	Low	High		
	Low	Incremental		
	Low	Medium		Yes
	Low	Medium		Yes
NT3	Low	Incremental		
	Low	High		
NT3	Low	High		Yes
	Low	High		
	Low	High		
	Low	High		Yes
	Low	High		Yes
	Low	Medium		
	Low	Medium	C	
	Low	High		Yes
NT3	Low	Incremental		
	Low	Medium		Yes
	Low	High		
NT2	Medium	Medium	B	Yes
NT3	Low	Medium	C	Yes
	Low	Incremental		Yes
	Low	Incremental		
NT3	Medium	High		Yes

Ref	Centre	Borough	Network classification	Future potential network classification
112	Muswell Hill	Haringey	District	
113	West Green Road/ Seven Sisters	Haringey	District	
114	North Harrow	Harrow	District	
115	Pinner	Harrow	District	
116	Rayners Lane	Harrow	District	
117	South Harrow	Harrow	District	
118	Stanmore	Harrow	District	
119	Wealdstone	Harrow	District	
120	Kenton	Harrow/ Brent	District	
121	Collier Row	Havering	District	
122	Elm Park	Havering	District	
123	Harold Hill	Havering	District	
124	Hornchurch	Havering	District	
125	Rainham	Havering	District	
126	Upminster	Havering	District	
127	Eastcote	Hillingdon	District	
128	Hayes	Hillingdon	District	
129	Northwood	Hillingdon	District	
130	Ruislip	Hillingdon	District	
131	Yiewsley/ West Drayton	Hillingdon	District	
132	Brentford	Hounslow	District	
133	Feltham High Street	Hounslow	District	
134	Archway	Islington	District	

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
NT3	Low	Incremental		
	Low	Medium		Yes
	Low	Medium		
	Low	Incremental		
	Low	Medium		
	Low	High		
	Low	Incremental	C	
	Low	High	C	
	Low	High		
	Low	Incremental		
	Low	Medium		
	Medium	Incremental		Yes
NT3	Low	Medium		
	Low	Incremental		Yes
	Low	Medium		
	Low	High		
NT3	Low	High		Yes
	Low	Incremental		
	Low	Incremental		
NT3	Low	High		
	High	High	A/ B	
	Medium	High	C	Yes
NT3	Low	Medium	C	Yes

Ref	Centre	Borough	Network classification	Future potential network classification
135	Finsbury Park	Islington/ Hackney/ Haringey	District	
136	Brompton Cross	Kensington & Chelsea	District	
137	Earls Court Road	Kensington & Chelsea	District	
138	Fulham Road	Kensington & Chelsea	District	
139	King's Road (west)	Kensington & Chelsea	District	
140	Notting Hill Gate	Kensington & Chelsea	District	
141	Portobello	Kensington & Chelsea	District	
142	South Kensington	Kensington & Chelsea	District	
143	New Malden	Kingston	District	
144	Surbiton	Kingston	District	
145	Tolworth	Kingston	District	
146	Clapham High Street	Lambeth	District	
147	Stockwell	Lambeth	District	
148	West Norwood/ Tulse Hill	Lambeth	District	
149	Lavender Hill/ Queenstown Road	Lambeth/ Wandsworth	District	
150	Deptford	Lewisham	District	
151	Downham	Lewisham	District	
152	Forest Hill	Lewisham	District	

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
NT3	Medium	High	C	Yes
	Medium	Medium	C	
	Low	Incremental	C	Yes
	Low	Incremental	C	
	Medium	Incremental	C	Yes
	Medium	Medium	B	
	Medium	Incremental	C	Yes
NT1	Low	Medium	C	
	Low	High	C	
	Low	Medium	C	
	Low	High	C	
NT2	Low	Medium		Yes
	Low	Incremental		Yes
	Low	High		Yes
	Low	High	C	Yes
	Low	Medium		Yes
	Low	Incremental		Yes
	Low	Incremental		Yes

Ref	Centre	Borough	Network classification	Future potential network classification
153	New Cross and New Cross Gate	Lewisham	District	
154	Sydenham	Lewisham	District	
155	Blackheath	Lewisham/ Greenwich	District	
156	Lee Green	Lewisham/ Greenwich	District	
157	Mitcham	Merton	District	
158	Morden	Merton	District	
159	Canning Town	Newham	District	
160	East Beckton	Newham	District	
161	Forest Gate	Newham	District	
162	Green Street	Newham	District	
163	Barkingside	Redbridge	District	
164	Gants Hill	Redbridge	District	
165	South Woodford	Redbridge	District	
166	Wanstead	Redbridge	District	
167	East Sheen	Richmond	District	
168	Teddington	Richmond	District	
169	Twickenham	Richmond	District	
170	Whitton	Richmond	District	
171	Canada Water	Southwark	District	Major
172	Dulwich - Lordship Lane	Southwark	District	
173	Camberwell	Southwark/ Lambeth	District	
174	Carshalton Villiage	Sutton	District	
175	Cheam Village	Sutton	District	

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
NT3	Low	Medium		Yes
	Low	Medium		Yes
NT3	Low	Incremental		
	Low	Medium		
	Low	High		Yes
	Low	High		
	Medium	High		Yes
	Low	High		Yes
	Low	Incremental		Yes
	Medium	High		Yes
	Low	High		
NT3	Low	High		
NT3	Low	High		
	Low	Incremental		
	Medium	Incremental	C	
NT3	Low	Incremental	C	
NT3	Medium	Incremental	B	
	Low	Incremental		
NT3	High	High	C	Yes
	Low	Medium		
	Low	Medium		Yes
	Low	Incremental		
	Low	Incremental		

Ref	Centre	Borough	Network classification	Future potential network classification
176	North Cheam	Sutton	District	
177	Rosehill	Sutton	District	
178	Wallington	Sutton	District	
179	Worcester Park	Sutton	District	
180	Bethnal Green	Tower Hamlets	District	
181	Brick Lane	Tower Hamlets	District	
182	Chrisp Street	Tower Hamlets	District	
183	Roman Road (east)	Tower Hamlets	District	
184	Roman Road (west)	Tower Hamlets	District	
185	Watney Market	Tower Hamlets	District	
186	Whitechapel	Tower Hamlets	District	
187	Bakers Arms	Waltham Forest	District	
188	Highams Park	Waltham Forest	District	
189	Leyton	Waltham Forest	District	
190	Leytonstone	Waltham Forest	District	
191	North Chingford	Waltham Forest	District	
192	South Chingford	Waltham Forest	District	
193	Wood Street	Waltham Forest	District	
194	Balham	Wandsworth	District	
195	Earlsfield	Wandsworth	District	
196	Southfields	Wandsworth	District	
197	Edgware Road/ Church Street	Westminster	District	
198	Harrow Road	Westminster	District	
199	Praed Street/ Paddington	Westminster	District	
200	St John's Wood	Westminster	District	

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
	Low	Medium		
	Low	Incremental		Yes
	Low	Medium		
	Low	Incremental		
	Low	High		Yes
NT2	Medium	Incremental		Yes
	Low	Medium		Yes
	Low	Incremental		Yes
	Low	Medium		Yes
	Low	High		Yes
	Medium	Medium		Yes
	Low	Medium		Yes
	Low	Medium		Yes
	Medium	High		
	Low	Medium		Yes
	Low	Medium		
	Low	Medium		
	Low	Medium		Yes
	Medium	High	C	
	Low	Medium		
	Low	Incremental		
	Low	High		Yes
	Low	Medium		Yes
NT3	Low	Incremental		
	Low	Incremental		Yes

Ref	Centre	Borough	Network classification	Future potential network classification
201	Euston Road (part)	Camden	CAZ retail cluster	
202	High Holborn/ Kingsway	Camden	CAZ retail cluster	
203	King's Cross/ St Pancras	Camden	CAZ retail cluster	
204	Tottenham Court Road (part)	Camden	CAZ retail cluster	
205	Cheapside	City of London	CAZ retail cluster	
206	Fleet Street	City of London	CAZ retail cluster	
207	Leadenhall Market	City of London	CAZ retail cluster	
208	Liverpool Street	City of London	CAZ retail cluster	
209	Moorgate	City of London	CAZ retail cluster	
210	Shoreditch	Hackney/ Islington	CAZ retail cluster	
211	Farringdon	Islington	CAZ retail cluster	
212	Lower Marsh/ The Cut	Lambeth	CAZ retail cluster	
213	Bankside and The Borough	Southwark	CAZ retail cluster	
214	London Bridge	Southwark	CAZ retail cluster	
215	Wentworth Street	Tower Hamlets	CAZ retail cluster	

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
	Medium	Incremental	CAZ	Yes
	High	Incremental	CAZ	Yes
NT2	High	Incremental	CAZ	Yes
NT1	Medium	Incremental	CAZ	
NT3	Medium	Incremental	CAZ	
	Low	Incremental	CAZ	
	Medium	Incremental	CAZ	
NT3	High	Incremental	CAZ	
	High	Incremental	CAZ	
NT1	Medium	Incremental	CAZ	Yes
NT2	Medium	Incremental	CAZ	
NT2	Medium	Incremental	CAZ	
NT1	High	Medium	CAZ	Yes
NT2	High	Medium	CAZ	
	Medium	Incremental	CAZ	Yes

Ref	Centre	Borough	Network classification	Future potential network classification
216	Baker Street (part)	Westminster	CAZ retail cluster	
217	Covent Garden/ Strand	Westminster	CAZ retail cluster	
218	Edgware Road South	Westminster	CAZ retail cluster	
219	Marylebone High Street	Westminster	CAZ retail cluster	
220	Marylebone Road	Westminster	CAZ retail cluster	
221	Victoria Street	Westminster	CAZ retail cluster	
222	Warwick Way/ Tachbrook Street	Westminster	CAZ retail cluster	
Centres with Night-time Economy classification only				
223	Barbican	City of London	Unclassified	
224	Southbank	Lambeth	Unclassified	
Centres with Future Potential Network classification only				
225	Brent Cross	Barnet	Unclassified	Metropolitan
226	Old Oak High Street	Hammersmith & Fulham/ Ealing	Unclassified	Major
227	Gallions Reach	Newham	Unclassified	Major
228	Barking Riverside	Barking & Dagenham	Unclassified	District
229	Merrielands Crescent	Barking & Dagenham	Unclassified	District
230	North Greenwich	Greenwich	Unclassified	District

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
	Medium	Incremental	CAZ	
NT1	Medium	Incremental	CAZ	
	Medium	Incremental	CAZ	Yes
	Medium	Incremental	CAZ	
	Low	Incremental	CAZ	Yes
NT2	High	Incremental	CAZ	
	Low	Incremental	CAZ	Yes
NT1	Medium	Incremental		
NT1	Medium	Incremental	CAZ	
	High	High	A/ B	Yes
	Medium	High	A/ future potential CAZ satellite	Yes
	Medium	High		
	Medium	Medium		
	Medium	High		Yes
NT1	High	High		Yes

Ref	Centre	Borough	Network classification	Future potential network classification
231	Tottenham Hale	Haringey	Unclassified	District
232	Colliers Wood	Merton	Unclassified	District
233	Old Kent Road/ East Street	Southwark	Unclassified	District
234	Old Kent Road/ Peckham Park Road	Southwark	Unclassified	District
235	Hackbridge	Sutton	Unclassified	District
236	Bromley-by-Bow	Tower Hamlets	Unclassified	District
237	Crossharbour	Tower Hamlets	Unclassified	District
238	Vauxhall	Lambeth/ Wandsworth	Unclassified	CAZ retail cluster
239	Battersea	Wandsworth	Unclassified	CAZ retail cluster

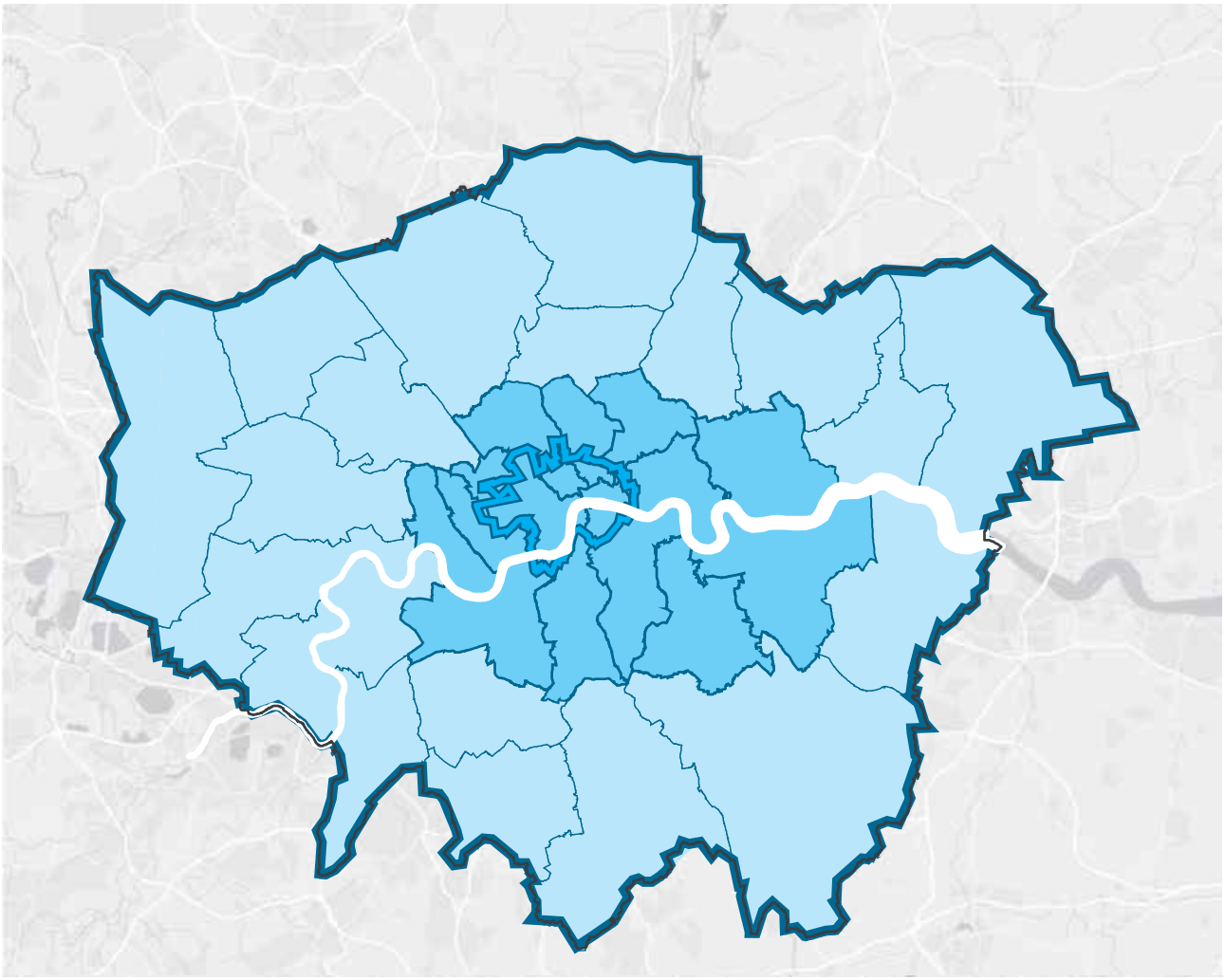
* This classification refers to those town centres that are within or overlap with the Strategic Areas for Regeneration (see Policy SD10 Strategic and local regeneration).

Night-time economy classification	Commer-cial growth potential	Residen-tial growth potential	Office guidelines	Strategic area for regeneration*
	High	High		Yes
	Medium	High		
	Medium	High	B	Yes
	Medium	High		Yes
	Medium	Medium		
	Medium	High		Yes
	High	High		
NT2	High	High	CAZ	Yes
	High	High	CAZ	

Annex 2

Inner and Outer London Boroughs

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*

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

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 Groups
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
CO2	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

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
NO2	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

PLA	Port of London Authority
PTAL	Public Transport Accessibility Level
PV	Photovoltaic
RFRA	Regional Flood Risk Appraisal
RIGS	Regionally-Important Geological Sites
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
VBC	Vacant Building Credit
WERLSPA	West End Retail and Leisure Special Policy Area
WHS	World Heritage Sites
WSE	Wider South East

Definitions

A

Active provision for electric vehicles

An actual socket connected to the electrical supply system that vehicle owners can plug their vehicle into (see also 'Passive provision for electric vehicles').

Affordable housing

Affordable housing is Social Rented, Affordable Rented and Intermediate Housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. This is a broad definition of affordable housing and is consistent with the 2012 NPPF. Paragraphs 4.7.3- 4.7.6 of this Plan set out the Mayor's preferred affordable housing tenures

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered as affordable housing for planning purposes.

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 noise from existing noise generating businesses on proposed new development close by, thereby ensuring that residents of the new development are protected from noise and existing businesses are protected from noise complaints. Similarly, any new noise 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 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.

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.

B

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.

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.

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

Brown roofs

Roofs which have a layer of soil or other material which provides a habitat or growing medium for plants or wildlife.

Build to Rent

Schemes which met the definition set out in Policy H13 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

These are schemes such as city car clubs and car pools, which facilitate vehicle sharing.

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.

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.

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

The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Construction and demolition waste

This is waste arising from the 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 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

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.

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.

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

This refers to relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible. 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 infrastructure

A network of green spaces – and features such as street trees and green roofs – that is planned, designed and managed to deliver a range of benefits. These include mitigating flooding, cooling the urban environment and enhancing

biodiversity and ecological resilience, as well as providing more attractive places for people.

Green roofs/walls

Planting on roofs or walls to provide climate change, amenity, food growing and recreational benefits.

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 Factor

A planning tool to ensure new developments provide adequate urban greening

Greening

The improvement of the appearance, function and wildlife value of the urban environment through soft landscaping.

H

Health inequalities

Health inequalities are systematic, avoidable and unfair differences in mental 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 jobs and employment prospects, their access to good public services and their habits.

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.

Housing in multiple occupation

Housing occupied by individuals of more than one household living together not as a family in non-self-contained accommodation.

I

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.

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.

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 that do not meet emissions standards for particulate matter.

M

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.

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

A property that has a cultural and/or natural significance that is so exceptional that it transcends national boundaries. A statement of Outstanding Universal Value is adopted by UNESCO's intergovernmental World Heritage Committee at the time of its inscription and may be subsequently amended by the Committee. Values can be physical, architectural or intangible. They will be 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.

P

Passive provision for electric vehicles

The network of cables and power supply necessary so that at a future date a socket can be added easily (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.

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.

Public Transport Accessibility Levels (PTALs)

Public Transport Accessibility 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. 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

Designated under the Convention on Wetlands of International Importance 1971.

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.

River Prospects

Short and longer distance visual experiences of the Thames riverscape.

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. Sites that are safeguarded are set out in the Safeguarded Wharves Review (2017/2018).

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).

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.

Site of Special Scientific Interest (SSSI)

A classification notified under the Wildlife and Countryside Act (1981 as amended). All the London sites of biodiversity interest are included within sites of Metropolitan Importance for Nature Conservation.

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 in specific and exceptional circumstances 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 hereto.

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 main reservoirs 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.

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 development

Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The UK Sustainable Development Strategy Securing the Future set out five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring

a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

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 view 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 green infrastructure elements that are most applicable in central London and London's town centres. Due to the morphology and density of the built environment in these areas, green roofs, street trees, and techniques such as soft landscaping, are the most appropriate elements of green infrastructure.

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 H6 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.

W

Water space

Area covered by water (permanently or intermittently), not adjacent land that is normally dry, and including the River Thames, other rivers and canals, and reservoirs, lakes and ponds.

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.

Z

Zero-carbon

Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere.

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