Draft London Plan

July 2026

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Foreword

London is the greatest city in the world. Its success has always depended on how well we have planned for growth and on the choices we make about the kind of city we want to be. This draft London Plan sets out a new strategic framework that will help deliver good growth and guide and shape our city's development in the years ahead.

This is a blueprint for how we can continue to build a fairer, greener London for everyone. The aim is to make the best possible use of City Hall's planning powers to achieve two key objectives: to fix the housing crisis in London and to deliver sustainable economic growth that benefits Londoners across our city. Crucially, we will do so while continuing to meet our ambitious climate commitments and improving our environment and green spaces.

Since becoming Mayor, I have made affordable housing a top priority and I'm proud that we have made significant progress. This includes starting more new council homes than at any time since the 1970s and, prior to the pandemic, completing more new homes in London than at any time since the 1930s. However, there's now a perfect storm facing housebuilding in London due to a combination of high interest rates, the rising cost of construction materials, the legacy of the pandemic, a shortage of skilled workers and the lasting impact of Brexit. All of this means we are now in the midst of the most difficult period for housebuilding since the global financial crisis.

That's why this new draft London Plan sets out to enable us to meet the challenges we face, boost our economy and build as many good-quality affordable homes as possible.

With the right national support – including key investment in transport infrastructure, such as the Bakerloo Line extension and the West London Orbital – we believe we can build as many as 558,000 new homes over the next decade in London.

My preference will always be to secure as many new homes as we can on brownfield sites – both large and small – and to ensure that housing delivery is accelerated wherever possible. But this alone will not be enough. That's why we will also look at some green belt land to help address the housing crisis. I can assure Londoners that there will be strict requirements in place. This includes maximising the level of affordable housing; ensuring high-quality housing design and good transport connectivity; and increasing biodiversity and access to good-quality green spaces as part of developments.

This London Plan will also strengthen London's position as the UK's economic powerhouse by creating the conditions for businesses to invest, innovate and create good jobs across the capital. This includes: preparing London for the industries of the future, such as data centres for AI; creating new strategic economic clusters to unlock future growth opportunities; revitalising high streets; and supporting London's 24-hour economy and the transformation of Oxford Street.

Alongside the London Growth Plan, this new draft London Plan provides a blueprint to ensure businesses have the space they need to establish and grow in the right locations, underpinned by the necessary infrastructure investments.

I committed to bringing forward a streamlined draft London Plan that retained the quality and standards of the current Plan but in a framework that is clearer and easier for industry and decision-makers to implement, and which would not increase the overall burden of requirements on development. At nearly half the length of the 2021 Plan, I'm pleased to have been able to deliver on this commitment.

Our record of achievements when it comes to planning in London shows what can be done when the government, boroughs, businesses and City Hall work in partnership, aligned on delivering housing and economic growth. This collaborative spirit will underpin the success of this new plan.

I encourage you to take part in the consultation and to help us deliver a new London Plan that will build a brighter, fairer and more prosperous London for everyone, where no one is left behind.

Sir Sadiq Khan
Mayor of London

1 Overview of the Plan & Good Growth Objectives

1.1 It is a legal requirement for the Mayor to publish a Spatial Development Strategy – the London Plan – and keep it under review. This is a new London Plan[1] which has been developed in line with relevant requirements[2] and has taken into account the draft National Planning Policy Framework (NPPF) published by the government in December 2025.

1.2 The London Plan sets the Mayor's strategy for spatial development in Greater London, including the general policies that deal with development and use of land. It is the spatial expression of the Mayor's other strategies[3] and other relevant policies.[4] It deals with matters of strategic importance for Greater London and sets out an integrated framework for the development of London over the next 20 years, including requirements for homes, jobs, transport, and other infrastructure, as well as policies to ensure good quality development. The Plan will run from adoption to 2046-7. This enables the Mayor to plan properly ahead, and is reflective of the context in which major transport and other infrastructure takes many years to plan and deliver.

1.3 The Plan is made up of four parts comprising:

- **The introduction** (chapter 1) of the Plan, sets out the underpinning objectives, the Plan's approach to housing need with a high-level statement of justification and statement of regard to relevant legal requirements.
- **The main body** (chapters 2-6) of the plan includes five policy chapters. Each chapter starts with an overall justification of the policies within that chapter, (additional 'rationale' text is provided with each policy). This builds on the high-level statement of justification in the introduction, and together this constitutes the Reasoned Justification[5]. Each policy also has implementation text (to aid understanding and application of policies). In a number of places the policies include boxes; for the avoidance of doubt, these should be taken to be part of the policy (have policy status), as should any tables or figures explicitly referenced in the policy or policy boxes.
- Glossary and Table of Abbreviations
- Annexes

1.4 In preparing this draft Plan in accordance with legislation[6] and associated regulations[7],

[1] Referred to in the Greater London Authority Act 1999 as a 'replacement plan'.
[2] Including s334(2) Greater London Authority Act 1999
[3] Including those dealing with transport, environment, economic development, housing, culture, health and health inequalities
[4] Including the London Growth Plan
[5] Regulation 4 of the Town and Country Planning (Spatial Development Strategy) Regulations 2000
[6] This includes those matters specified in section 30, section 41, section 309 E-H and section 342(1) (a) of the GLA Act
[7] Including Regulation 4 and 6 of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000

the Mayor has had regard to:

- the promotion of economic development and wealth creation, social development and the improvement of Greater London's environment (the Greater London Authority's (GLA's) principal purposes)
- promoting Londoners' health and reducing health inequality
- 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
- consistency with national policies and international treaty obligations notified to the Mayor by the government, without seeking to repeat national policy
- all relevant retained EU obligations
- the Mayor's other statutory obligations – including 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.
- regional planning guidance issued by the Secretary of State as relating to an area including or adjoining Greater London
- the national waste management plan
- the objectives of preventing major accidents and limiting the consequences of such accidents for health and the environment
- appropriate safety distances between residential and other areas; buildings and areas of public use; and major transport routes
- the protection of areas of natural sensitivity or interest
- such measures as are necessary in relation to existing establishments for the avoidance of risks to human health and the environment.

1.5 The location and nature of development across London has significant and cumulative impacts beyond individual borough boundaries. The London Plan plays an essential role in setting strategic planning policies so that city-wide positive outcomes are best realised and negative impacts (as far as possible) are minimised and mitigated.

1.6 London has inextricable links with its neighbouring regions, the South East and the East of England, and the Plan seeks to reflect this context as appropriate, noting however that the Mayor has no remit to plan beyond London's boundary.

Good Growth

1.7 The Mayor's ambition for Good Growth – growth that drives economic productivity, is socially inclusive and environmentally sustainable – continues to underpin the Plan. The four objectives (shown in Table 1.1 together with the Good Growth sub-objectives), individually and collectively contribute to delivering Good Growth and addressing how London can respond most effectively to the challenges and opportunities the city faces.

Table 1.1: Good Growth objectives

Good growth objective	Good Growth sub-objectives	Reasoned justification
Making the best use of land	Meet development and transport needs through optimised land use to minimise loss of greenfield land and other valued features and ensure Londoners can keep moving in the most efficient way. Effectively manage competing land uses to ensure sufficiency in quantum and location for different needs. Ensure infrastructure better addresses existing needs and supports good growth in a timely, space-efficient, and cost-effective manner. Enable places to renew and evolve in a way that makes the most of place-based assets and opportunities and addresses both strategic and community needs.	Land is scarce and finite. Planning has a vital role to play in ensuring that its use is optimised to deliver against the range of requirements for housing and economic activities – as well as the green, transport social and utility infrastructure that is so important for Londoners. With every foregone opportunity to make better use of land, and to optimise densities, the pressures grow, adverse impacts accumulate, and key targets and outcomes become ever harder to achieve.
Delivering the homes and neighbourhoods Londoners need	Address current housing shortfalls; and ensure enough good-quality homes for a growing and changing population can be brought forward. Improve affordability and availability of suitable homes for all, in neighbourhoods that offer housing choice and bring diverse communities together. Help to increase the rate, diversity and continuity of housing delivery. Ensure neighbourhoods provide safe, comfortable and convenient access to a range of facilities and services that address varied household and community needs.	Planning for the homes and neighbourhoods that London needs is a key priority for the London Plan. The lack of affordable and in some cases accessible housing is driving significant inequality; poor health outcomes and wider social inequality. In seeking to deliver more homes, their quality and that of wider neighbourhoods remains vitally important, particularly as London densifies.

Good growth objective	Good Growth sub-objectives	Reasoned justification
Growing London's economy in a way that benefits all	Secure sufficient space and infrastructure to enable economic activity to grow. Support priority growth sectors and businesses to improve their productivity and to thrive. Support economic clusters to evolve, to better meet the diverse and changing needs of people and businesses; and to improve their resilience to economic and social change. Improve access to jobs, skills and opportunities for all. Contribute to an accelerated shift to a more sustainable economy, reducing local and global environmental harm.	Planning has a vital role to play in supporting the delivery of the London Growth Plan. As well as tackling the lack of affordable housing, planning also needs to help unlock a range of premises for offices, lab space, industrial and creative workspace, experience, leisure and retail – as well as the growing demand for data centres. It also needs to ensure that land is available for critical infrastructure (such as transport and energy) and other needs. This needs to be done in a way that secures the benefits while minimising environmental and other impacts.

Good growth objective	Good Growth sub-objectives	Reasoned justification
Creating a greener, resilient and healthy city	Contribute to realising London's net zero-carbon ambition; and improve the resilience of people, buildings and places to climate change impacts. Conserve and enhance the natural environment to achieve environmental net gains; promote biodiversity; and support recovery and renewal of natural systems. Support the creation of greener places that bring nature closer to people and a greener built environment that supports efficient resource use Contribute to a reduction in pollution and in exposure to pollution – supporting the ambition of achieving clean and healthy air and waterways. Enable improvements in mental and physical health; and a reduction in health inequalities.	The environment around us impacts on mental and physical health; and the resilience of people and places to climate change. Planning helps in setting clear expectations and in supporting delivery of built and natural environments that promote liveability; inclusion and equality of opportunity; resilience; net zero carbon; and improved health for all. As London grows and densifies it is ever more important to enhance access to green space and ensure that planning, place-based approaches and design create a greener, resource-efficient, resilient and healthy city.

1.8 The Plan is structured around these objectives and sets out the policies designed to support their delivery. The final chapter, "Place visions and place-based approaches", sets out policies for particular locations or land-use designations; and draws together the associated approaches necessary to deliver the homes and jobs London needs in the most sustainable way.

The Plan's approach to addressing housing need

1.9 On past trends London is expected to add as many as 1 million more additional residents over the Plan period - growing to a population of over 10 million. A huge increase in housing delivery is needed to both accommodate future growth and address the chronic shortage of homes for existing residents. The government has set the housing need in London at 84,884 new homes per year.

1.10 This London Plan is necessarily more focused and directive than previous versions given this scale of challenge and the growing pressures on limited land to support not just housing but a range of other economic and functional activities. This comes in a context of significant viability challenges and, while the Plan looks beyond the immediate conditions and single economic cycles, it needs to reflect assumptions that are reasonable.

1.11 It must also avoid placing too high a burden on development in London. The Plan

therefore seeks to strike a careful balance. It focuses on policies that are considered genuinely necessary to tackle the most pressing social and environmental challenges in our city (such as affordable housing, accessibility and heat risk) and to deliver development in a way that avoids unacceptable cumulative adverse impacts (by requiring densities to be optimised and focusing on sustainable locations). At the same time, the number of policies has been reduced, there has been significant alignment with the draft NPPF, reducing the detail in the draft Plan and dovetailing with national requirements across a range of policy areas. In addition, processes have been streamlined and the Plan aims to set a consistent approach across London on a number of key matters such as energy-efficiency and market housing mix to make development simpler and more viable, while maintaining quality.

Setting the target

1.12 This Plan sets out how we can deliver 558,000 homes over the ten-year period up to 2037 and allocates targets on this basis to each plan-making authority in London.

1.13 This is based upon an assessment of what could be feasibly deliverable in the coming decade, taking into account viability and build-out rates, while analysing and optimising what more is possible through the lens of the Plan's new and ambitious policy framework – representing a step change in the approach to planning for housing in London. This includes policies to boost housing delivery through:

- optimising brownfield sites, building out Opportunity Areas and evolving town centres
- closer integration between land use and transport - leveraging all opportunities from existing and planned transport, using new tools & approaches
- making a step change in the approach to small sites (e.g. London-wide design code) and suburban densification (through the new Optimisation Framework)
- targeting some industrial land release in accessible locations for housing
- using the Green Belt to deliver major new settlements and ensure industrial provision, while increasing access to nature and deliver Biodiversity Net Gain.
- deploying a range of tools such as Local and Mayoral Development Orders to increase certainty in planning system and drive density and delivery in sustainable locations
- managing car parking to maximise land available for housing and other needs (and avoid unacceptable levels of congestion)
- tackling viability constraints through consideration of alternative delivery formats, and other development expectations, including quality place-making and more active public sector delivery role.

1.14 The Mayor is very conscious that this does not meet the government's housing need figure for London. More is possible beyond the initial ten-year period, and the Plan identifies opportunities and capacity to deliver homes up to and beyond the 850,000 - but this requires investment, measures and delivery rates that can only realistically and properly be put in place beyond the ten-year timeframe.

1.15 The Plan highlights further capacity to come on stream from across different sources of supply, including ongoing build-out of brownfield sites and small site delivery, unlocking

of further capacity in Opportunity Areas, and further managed release of industrial and Green Belt land. The Mayor is putting in place the policies to unlock this future capacity, and will ensure that boroughs plan to bring it forward through their local plans.

1.16 Much of this potential is directly linked to enhanced connectivity, through new and improved public transport connections to enable it. This includes the West London Orbital to support over 25k homes; the Bakerloo Line Extension (BLE) to Hayes, to support more than 60k homes; further metroisation, for example South Central, supporting more than 30k homes, and a range of improvements to connections to locations in the Green Belt [which are not yet at design stage].

1.17 Alongside this needs to come the expansion and delivery of utilities, flood risk and social infrastructure, as well as regeneration and place-making investment. This will inevitably take time, not only in terms of the funding available but also its planning and delivery, with construction and supply-side constraints and impacts that must be managed by careful sequencing.

1.18 The Mayor is committed to doing all he can to help bring forward the homes that Londoners need as quickly as possible and is keen to work with central government, boroughs and other partners to tackle the issues and secure the necessary infrastructure. He will closely monitor the conditions and - as further locations become deliverable in a manner compatible with good growth - he will review the housing targets and increase them accordingly.

Managing adverse impacts

1.19 Thorough analysis makes clear it is not currently possible to go further than this on housing numbers in this next ten-year period. This would otherwise mean adopting unrealistic assumptions and significantly risking both unmanageable and unacceptable levels of adverse impacts as well as the longer-term trajectory for potential for higher housing delivery. While the Plan has identified capacity to meet the government housing figure, a range of important (and currently insurmountable) factors constrain the timescale for its delivery. These include:

- Denser, well-connected homes are significantly less environmentally harmful and the Plan has therefore focused first on currently sustainable locations. If homes are brought forward in a piecemeal way without good connections to public transport, and therefore at lower (car-dependent) densities, this would result in unmanageable congestion and associated environmental impacts. This is important not just in terms of the impacts themselves but because it would ultimately reduce the overall numbers of homes that could be delivered. London in this next period has only a certain scope for development before significant air quality impacts, including on protected sites. This scope would be used up quickly – and for a far lower number of homes overall - if we moved forward without the necessary transport infrastructure and mitigations.

- Furthermore, attempting such an unprecedented level of growth in a shorter timeframe would result in severe crowding on the existing transport network. The schemes highlighted above are critical to address this but so too are continued upgrades to existing public transport services across London (including London Underground, London Overground, DLR, trams, buses and national rail). The ten-year growth being planned for already assumes some pressures across the network even with continued upgrades, and there is a limit to how much more can be achieved in the same time period. Crossrail 2 will also ultimately be needed, as existing lines reach upgrade limits.
- The expansion of utilities, flood risk and social infrastructure needs aligning with housing delivery. This is vital not just to ensure basic needs are met, but also to provide for important resilience, address decades of underinvestment (which already have adversely impacted our environment, such as the state of London's waterways), support the move towards net zero and to continue to address health inequalities.
- London must also plan for other needs and land use requirements beyond housing supply. In order to support both the London Growth Plan and the National Industrial Strategy, the Plan seeks to provide sufficient land and supporting infrastructure to meet identified economic needs, including for growing uses such as data centres. Without this London would fail to deliver its economic potential, so vital for Londoners and nationally.
- London's housing capacity must also be net of greenspace needs. These are not just fundamental to the health and wellbeing of communities, but also to address environmental and resilience needs, including nature recovery, flood risk mitigation and urban cooling (noting the CCC report[8] highlighted London as amongst the highest risk areas in the UK for heat deaths).
- It is also important to consider the consequences of the NPPF's Housing Delivery Test and 5-Year Housing Land Supply requirements. If targets are set in the London Plan beyond what is reasonably achievable for local planning authorities (LPAs), this would weaken the plan-led approach - and thereby undermine the very framework that is vital to actually enable the growth and address its impacts.

Beyond the Planning System

1.20 It is important to note how significant the required increases in levels and rates of delivery actually are. It has taken approximately 30 years to deliver the last 850,000 homes. In recent decades the peak of delivery has been around 45,000 homes per year. London has never developed at this rate before, and the closest that it has got to delivery at this level was in the 1930s with a major expansion of the tube network and the expansion of London's boundaries.

1.21 There are inevitably some constraints on build-out rates. Major multi-phase Opportunity Areas and Green Belt sites (which require whole new utility infrastructure) will take time. The Plan aims for ambitious delivery rates, supported by public sector intervention where appropriate, but there are limits to what can be assumed in the shorter to medium term,

[8] Climate Change Committee – 'A well-adapted UK'

particularly from the current starting point.

1.22 The delivery of affordable housing is not only essential to meet Londoners' needs, but also to support housing delivery overall given its role in reducing exposure to absorption rate issues (i.e. how quickly homes can be sold in a market) which act as a significant limitation on the volume and speed of market housing delivery. Given the scale of housing need, significant increases in funding for affordable housing grant must be made available to bolster supply in both the 10 year and longer-term period. Whilst the Mayor has secured up to £11.7bn in grant funding through the London Social and Affordable Homes Programme 2026-36 (which is London's biggest and longest affordable housing funding settlement), this is still insufficient to meet the scale of housing delivery required.

1.23 Other mechanisms to enhance delivery will also be important, such as diversifying operators within the sector (e.g. small and medium-sized housebuilders and Build-to-Rent); increasing the level of institutional investment in London's housing market and new sources of finance to support housing delivery; tackling supply chain blockers (e.g. labour) and measures to support higher density housing.

1.24 A current lack of demand for market sale new-build housing is part of the reason schemes in London are stalling and slow to build out. Action is therefore also needed on progressive demand-side measures to help increase the numbers of people who are able to buy market homes, in turn creating the incentive for supply to speed up.

1.25 The Plan's supporting Viability Study[9] shows that London is in an extremely challenging viability context due to e.g. increased build costs and interest rates. This is a particular limitation on shorter term delivery, even where appropriate land has been identified. This means that the growth required is not likely to be brought forward solely by the market at this time. New delivery models with greater public sector intervention will therefore be needed. The public sector requires the capacity to take a more interventionist role in both the housing and land markets to support housing delivery and create the conditions for investment. The Mayor has secured £324m in grant funding for the City Hall Developer Investment Fund to unblock stalled sites, and will deliver a further £1.5bn in low-interest loans for housing associations. Beyond this, delivery models such as greater land assembly, more pro-active intervention in de-risking sites and partnership approaches are required to unlock higher levels of housing.

[9] London Plan Viability Study Phase 1 Report

2 Making best use of land and achieving Good Growth

Reasoned justification for chapter 2

2.1 The London Plan seeks to ensure that objectively assessed needs, and the Good Growth objectives are met as far as possible. It sets out a framework to enable significant increases in housing, economic growth, supporting infrastructure and quality of environment and place – and to do this in a way that best supports improvements to inclusivity, fairness, resilience, carbon emissions and health.[10] The policies in this chapter both distribute that growth and seek to optimise and shape it to help meet the Plan's objectives and minimise impacts.

2.2 Development is principally organised around making best use of sustainable transport[11] and strategically significant environmental opportunities, as reflected in Broad Locations for Growth (BLGs) and Environmental Opportunity Areas (EOAs). There is a route map to do this that stretches beyond the initial 10 years of the Plan, looking ahead to how future transport investment can pave the way for further growth both within and beyond London. It also sets out how provision for environmental recovery and access to nature can be secured in tandem.[12] These principles are at the heart of the plan, helping us to make best use of precious land and London's existing infrastructure and enabling us to secure multi-benefits rather than driving cumulative disbenefits.[13] For example, development that is not car-dependent can deliver significantly more homes on the same area, leaving space to meet other important needs e.g. green space.[14] In turn, this is critical to us realising ambitions to reach net zero, support public health, reduce health inequalities, grow productivity and improve equality of opportunity.

2.3 The Plan seeks to deliver as much of the development as possible on brownfield land. It does so while protecting assets including Metropolitan Open Land, the historic environment,[15] and well-located industrial land. This requires the optimisation of brownfield sites to meet as much need as possible; therefore, a core part of the approach is to support more density in more parts of London. This is aligned with transport connectivity, re-establishing and strengthening this fundamental linkage. This means that many more areas of London must embrace mid-rise development. This is a form of development that can bring many benefits and is at the crux of this Plan. Meanwhile, tall buildings (where justified by both connectivity and the Plan's setting analysis) will also feature in a more plan-led way with the tallest buildings focused on 17 identified strategic locations.

2.4 But this approach alone is insufficient: additional land in the Green Belt is required to help meet housing, economic and associated infrastructure needs. This Plan has been

[10] See IIA Scoping, and the GLA's obligations arising from the GLA Act
[11] Public transport, active travel and freight movements that minimise pollution impacts
[12] Drawing on the LNRS, LGIF and Clean and Healthy Waterways Plan.
[13] As demonstrated by impact assessments and transport modelling
[14] See Integrated Impact Assessment
[15] Including 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

informed by a strategic assessment of London's Green Belt, and other work to identify the most sustainable locations for growth within it. However, in line with clearly articulated policy and stakeholder preference, the Plan maintains a brownfield-first approach as reflected in the phasing of these areas (representing a smaller proportion of overall growth needs in the first 10 years of the Plan), and higher expectations for greenfield development. It is also reflected in expectations regarding the response to other place assets and opportunities (such as economic clusters) that are brownfield-focused.

2.5 Despite the significant embedded investment in London's existing infrastructure, significant upgrades, expansions and different management approaches will be needed to unlock further growth beyond the 10-year period. Only in this way will new development be sustainable, adaptable to changing patterns of use and needs and able to meet the good growth objectives. The spatial strategy reflects the strategic infrastructure interventions needed to underpin growth; and the wider policies, the coordinated approaches needed to support this across the range of vital infrastructure. This reflects the experience and modelling of infrastructure providers (including Transport for London (TfL) and utilities companies) and the wider GLA. It is also informed by increasingly important integrated practices that address shortcomings of previous approaches.

2.6 Making best use of land in a way that works for people and the city overall – not just now, but into the future must be underpinned by cross-cutting design policies, focused on ensuring the lasting quality and adaptability of places, and on what is needed to support higher-density living. These policies[16] recognise the important interaction between the mix of uses, form and placement of buildings and infrastructure, and the nature of the interconnecting public realm. This is what creates that quality and inclusive liveability. They also help to balance the importance of valuing features that contribute to London's global identity and attraction,[17] and the need for change (with that change being necessary to accommodate London's growth needs, future-proof the city and deliver against the Mayor's ambitions).[18] As London grows and intensifies, each development can be an opportunity to address different needs in a cost-effective way, alongside its primary purpose.

2.7 The policies also address other realities of being a city on the global stage. Through these lenses, national policy is built upon and applied in a way that responds to London's unique context and particular pressures.[19] This is also important as part of the ongoing process of making best use of land over the long term.

2.8 The overarching spatial strategy is illustrated on the 10- and 20-year key diagram, with a further Infrastructure specific sub-key diagram setting out clearer detail on specific infrastructure schemes where this is known. Spatial aspects of the design policies are set out on the Places sub-key diagram at the start of chapter 6.

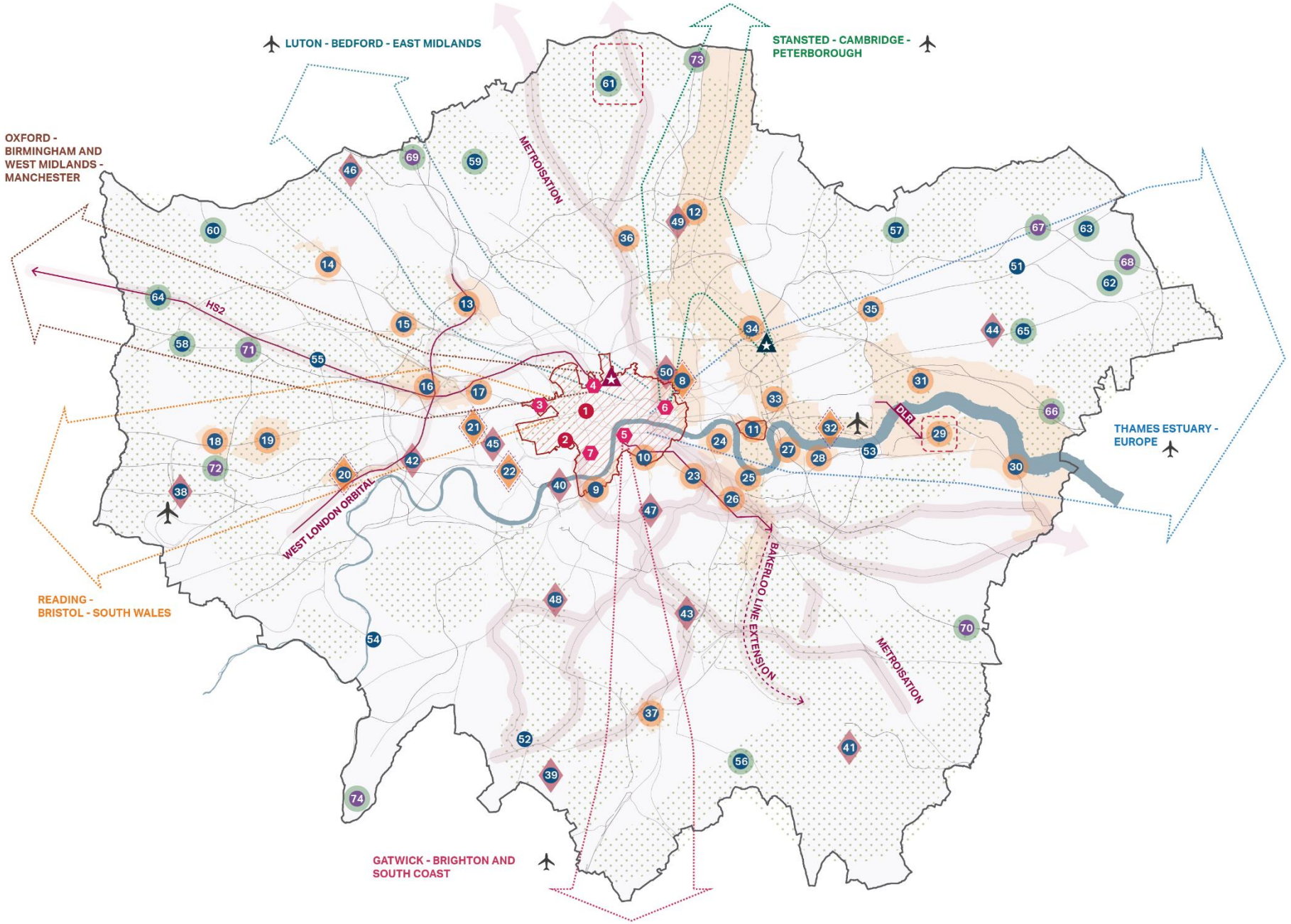
[16] In conjunction with more focused policies in other chapters, notably HN8 Hosing Design which helps ensure as densities increase, quality of internal units is also maintained.

[17] Including London's 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

[18] See The Mayor's Transport Strategy - Transport for London, London Environment Strategy | London City Hall and the The Mayor's Violence Against Women and Girls Strategy 2022-25 | London City Hall

[19] Including viability – the need to create value, crime and security threats, and significant inequalities

Figure 2.1: 10 year key diagram


LUTON - BEDFORD - EAST MIDLANDS
STANSTED - CAMBRIDGE - PETERBOROUGH
OXFORD - BIRMINGHAM AND WEST MIDLANDS - MANCHESTER
METROISATION
HS2
WEST LONDON ORBITAL
DLR
THAMES ESTUARY - EUROPE
READING - BRISTOL - SOUTH WALES
BAKERLOO LINE EXTENSION
METROISATION
GATWICK - BRIGHTON AND SOUTH COAST

KEY DIAGRAM
10 Year

International Centres

1. West End
2. Knightsbridge

BLG: Transformational Gateways

3. Paddington
4. Euston
5. Waterloo
6. Liverpool Street
7. Victoria

Environment Opportunity Areas *(see Environment sub-key diagram)*

Strategic Transport Improvements *(see Infrastructure sub-key diagram)*

Airport

St Pancras International

Stratford International

Shortlisted New Town

Opportunity Areas

Strategic Growth Corridors

- Lea Valley (Stratford to Cambridge)
- Elizabeth Line West and Heathrow (Paddington to Reading and Heathrow)
- Thameslink South (Central London to Croydon and Brighton)
- Elizabeth Line East, DLR extension and Thames Gateway (Liverpool Street to Woolwich and Shenfield)
- HS2 (Euston and Old Oak to Birmingham)
- Thameslink North (Kings Cross to Luton and Bedford)

BLG: Central Activities Zone (CAZ) inc. Northern Isle of Dogs (NIOD)

BLG: Brownfield First Opportunity Areas (BFOAs)

8. City Fringe/Tech City*
9. Vauxhall, Nine Elms and Battersea
10. Elephant and Castle
11. Isle of Dogs and South Poplar
12. Lee Valley
13. Brent Cross/Cricklewood/ Staples Corner
14. Harrow and Wealdstone
15. Wembley
16. Old Oak/Park Royal
17. Kensal Canalside
18. Hayes
19. Southhall
20. Great West Corridor*
21. White City* Earl's Court/West
22. Kensington*
23. Old Kent Road
24. Canada Water Deptford Creek/
25. Greenwich Riverside New Cross - Lewisham -
26. Catford
27. Greenwich Peninsula
28. Charlton Riverside
29. Thamesmead and Abbey Wood
30. Bexley Riverside
31. London Riverside
32. Royal Docks and Beckton Riverside*
33. Poplar Riverside
34. Olympic Legacy
35. Ilford
36. Wood Green
37. Croydon

**BFOA's marked with an asterisk are also strategic economic clusters.*

BLG: Strategic Economic Clusters

38. Heathrow Economic Area
39. London Cancer Hub
40. Battersea (Ransome's Dock)
41. Biggin Hil
42. Chiswick Park
43. Crystal Palace
44. Dagenham East
45. Olympia
46. Royal National Orthopaedic Hospital
47. SC1 King's College Hospital, Denmark Hill
48. St George's Hospital
49. Tottenham
50. Whitechapel

BLG: Brownfield Town Centre and Other

51. Romford
52. Sutton
53. Woolwich
54. Kingston
55. Greenford

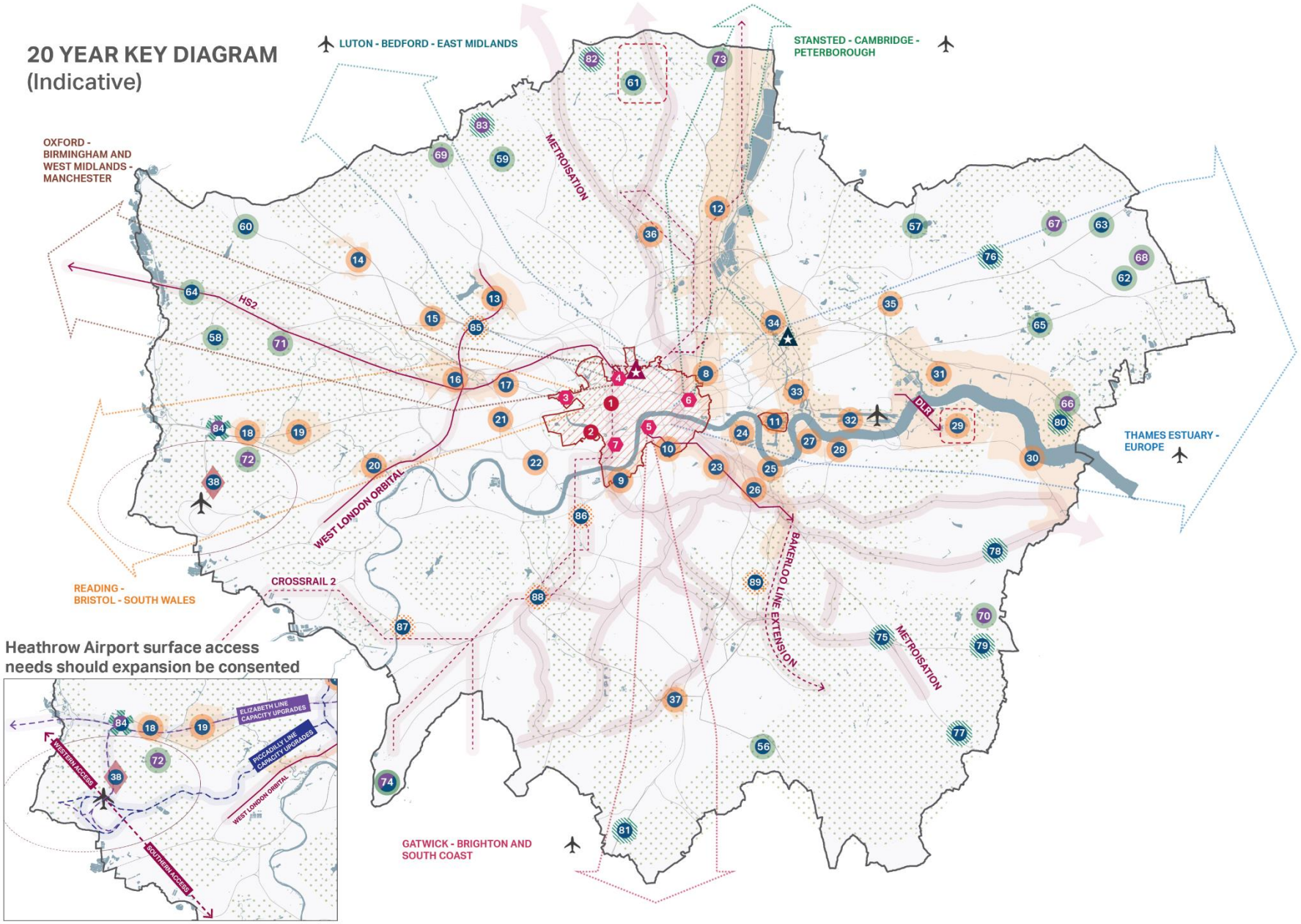
BLG: Green Belt Residential-led Mixed Use

56. Croydon-New Addington
57. Eastern Hainhault Loop
58. East of Ickenham
59. Mill Hill and Barnet
60. Northwood
61. Crews Hill and Chase Park
62. Upminster
63. Harold Park
64. West Rusilip
65. Dagenham

BLG: Green Belt Industrial

66. A13 (Rainham Area)
67. A12 (Romford Area)
68. A127 (Upminster Area)
69. M1 (Borehamwood West Area)
70. M20 (Swanley Area)
71. M40 (Northolt Area)
72. M4 (Heathrow Area)
73. M25/A10 (Northern Lea Valley Area)
74. M25 South (South Chessington Area)

Figure 2.2 Indicative 20 Year key diagram


20 YEAR KEY DIAGRAM
(Indicative)
LUTON - BEDFORD - EAST MIDLANDS
STANSTED - CAMBRIDGE - PETERBOROUGH
OXFORD - BIRMINGHAM AND WEST MIDLANDS - MANCHESTER
METROISATION
HS2
WEST LONDON ORBITAL
CROSSRAIL 2
DLR
BAKERLOO LINE EXTENSION
METROISATION
THAMES ESTUARY - EUROPE
READING - BRISTOL - SOUTH WALES
GATWICK - BRIGHTON AND SOUTH COAST
Heathrow Airport surface access needs should expansion be consented
ELIZABETH LINE CAPACITY UPGRADES
PICCADILLY LINE CAPACITY UPGRADES
WESTERN ACCESS
WEST LONDON ORBITAL
SOUTHERN ACCESS

20 YEAR KEY DIAGRAM (Indicative)

Other transport interventions will be needed but are not yet sufficiently scoped to appear on this diagram.

Environment Opportunity Areas
(Subtypes shown on Environment sub key diagram)

Strategic Transport Improvements
(Refer to Infrastructure sub key diagram)

St Pancras International

Stratford International

Shortlisted New Town

Airport

Strategic Growth Corridors

- Lea Valley (Stratford to Cambridge)
- Elizabeth Line West and Heathrow (Paddington to Reading and Heathrow)
- Thameslink South (Central London to Croydon and Brighton)
- Elizabeth Line East, DLR extension and Thames Gateway (Liverpool Street to Woolwich and Shenfield)
- HS2 (Euston and Old Oak to Birmingham)
- Thameslink North (Kings Cross to Luton and Bedford)

BLG: Central Activities Zone (CAZ) inc. Northern Isle of Dogs (NIOD)

BLG: Brownfield First Opportunity Areas (BFOAs)*

** For detail on the BFOAs please refer to the 10 year Key Diagram.*

BLG: Strategic Economic Clusters

38 Heathrow Economic Area

BLG: Green Belt Residential-led Mixed Use

56 Croydon-New Addington *
57 Eastern Hainhault Loop *
58 East of Ickenham
59 Mill Hill and Barnet *
60 Northwood
61 Crews Hill and Chase Park
62 Upminster *
63 Harold Park
64 West Rusilip *
65 Dagenham

** Potential future residential additional capacity contingent on further scoping.*

BLG: Green Belt Industrial

66 A13 (Rainham Area)
67 A12 (Romford Area)
68 A127 (Upminster Area)
69 M1 (Borehamwood West Area)
70 M20 (Swanley Area)
71 M40 (Northolt Area)
72 M4 (Heathrow Area)
73 M25/A10 (Northern Lea Valley Area)
74 M25 South (South Chessington Area)*/**

/ (Both residential-led and industrial)*

BLG: Green Belt Future Candidate Residential-led Mixed Use

74 M25 South (South Chessington Area)*/**

75 Chislehurst and Petts Wood
76 Whalebone Lane
77 Knockholt
78 Sidcup and Bexley
79 St Mary Cray
80 Upminster Rainham
81 Southern Croydon

BLG: Green Belt Future Candidate Industrial

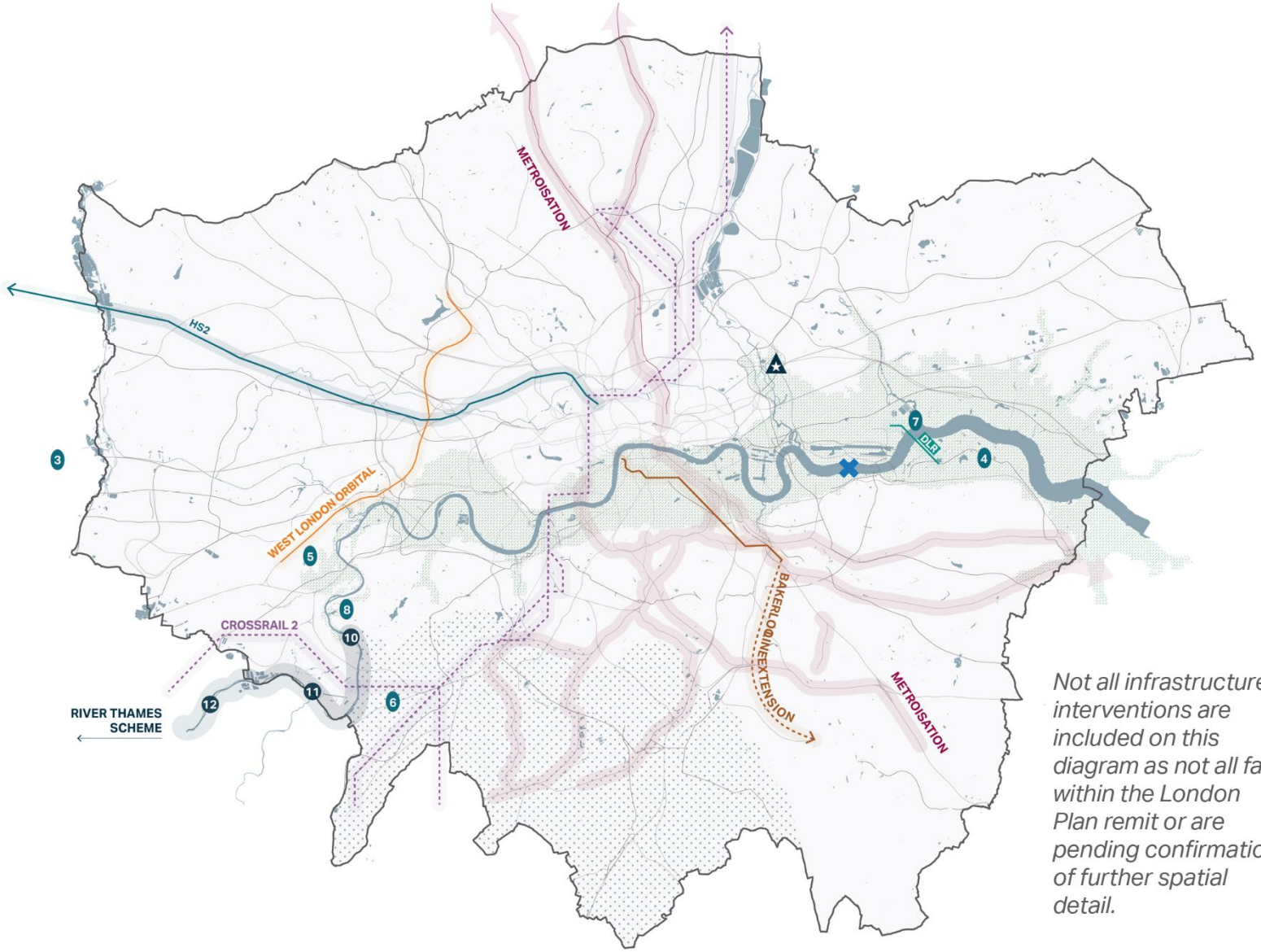
82 M25 North (Potters Bar Area)
83 A1 (Borehamwood East Area)

84 Stockley Park** (Both residential-led and industrial)

BLG: Future Candidate Brownfield First Opportunity Areas

85 Neasden
86 Clapham Junction
87 Kingston
88 Wimbledon/Colliers Wood
89 Bell Green

Figure 2.3: Infrastructure sub key diagram



Not all infrastructure interventions are included on this diagram as not all fall within the London Plan remit or are pending confirmation of further spatial detail.

KEY

Stratford International

Existing Transport Infrastructure

Transport Improvements

- Metroisation
- Bakerloo Line Extension
- West London Orbital
- DLR Extension
- HS2
- Crossrail 2

Waster, wastewater and flood risk

Thames Estuary 2100

1 White Horse Reservoir*
2 Grand Union Canal Transfer*
3 Egham to Iver Transfer
4 Crossness Sewage Treatment Upgrades
5 Mogden Sewage Treatment Upgrades
6 Hogsmill Sewage Treatment Upgrades
7 Beckton Sewage Treatment Upgrades and Waste Heat
8 Teddington Direct River Abstraction
9 Thames to Affinity Regional Transfer*

**Not shown on diagram as either located outside of London boundary.*

Existing Thames Barrier improvements at Woolwich Reach

(Noting alternative locations for a future replacement Thames Barrier are beyond London at Dartford and Gravesend)

River Thames Scheme

10 Teddington Weir
11 Molesey Weir
13 Sunbury Weir
14 Desborough Cut*
15 Spelthorne Channel Section*
16 Runnymede Channel Section*

**Not shown on this diagram but part of the River Thames Scheme.*

Waste

South London Intensification Programme

MBUL1 Spatial strategy

Policy aim: To meet London's spatial development needs; and distribute and manage growth in a way that optimises outcomes across Good Growth objectives

Applies to: All local plans and all development

Locations: All

Development management and plan-making

A New housing and employment development and infrastructure investment should be located, phased, coordinated and designed to:

(1) secure and realise the potential of sustainable access and strategic environmental opportunity, promoting greater connectivity and inclusivity, with particular reference to the opportunities highlighted by broad locations of growth (BLGs), strategic growth corridors, brownfield-first Opportunity Areas (BFOAs) and Environmental OAs on the key diagram, and the approach set out in policies MBUL2 Optimising the use of land and site capacity (and Table 2.1 Optimisation Framework), PV7 and GHR7

(2) achieve intensification of land use across London in a way that contributes to meeting London's different needs, and supports places to renew and evolve, responding positively to London's place assets, and building on the success of economic clusters

(3) ensure infrastructure sufficiency in respect of growth and wider good growth needs, with particular reference to the strategic infrastructure requirements set out in B(5)

(4) prioritise affordable housing provision and public transport improvements in developer contributions

(5) benefit overall strategic site delivery which may include agreeing exceptions to the prioritisation in (4) – particularly in early-scheme phases in relation to the diversity of housing mix and delivery model.

B Local plans should plan to deliver at least 558,000 additional new homes, proportionate space for employment and appropriate infrastructure (including health and other locally assessed social infrastructure) in a manner consistent with Part A of this policy; policies HN1Increasing London's housing stock, GLE1 Sufficient and appropriate employment space and the Place-vision policies. This means local plans, with reference to the key diagram and Annex C, should:

(1) through site allocations and review of designations, give priority to and realise the full potential of the growth corridors, the Central Activities Zone (CAZ) and the Northern Isle of Dogs (NIOD), BFOAs and other identified BLGs within the existing urban area, addressing their specific strategic opportunity where relevant, accommodating a significant proportion of required new homes and maintaining a reservoir of well-located employment land

(2) make provision for further strategic growth (c. 56,000 new homes and around 350 ha industrial land) beyond the existing built-up area through site allocations and Green

Belt release in identified BLGs where there is good transport connectivity and suitably achievable capacity

(3) support cross-boundary coordination of opportunities where appropriate, particularly along growth corridors that extend beyond London's boundary and where planned transport investment benefits a wider area

(4) support cumulatively significant growth on small sites and other land use intensification opportunities, such as the redevelopment of car parks, at a density commensurate with their connectivity and opportunity context as per MBUL2 Optimising the use of land and site capacity

(5) secure through safeguarding, site allocations and appropriate developer contributions, the following strategic infrastructure requirements:

i. sustainable transport investment as detailed in MBUL5/ Annex D to extend connectivity, expand capacity, improve quality and resilience.

ii. demand management interventions, parking standards and density minima set out in GHR11 Cycle and Car Parking and MBUL2 Optimising the use of land and site capacity, and other measures to ensure sustainable transport viability and manage network capacity

iii. enhancement of green infrastructure (including existing greenspace) at a variety of scales in line with policy GHR7 Green Infrastructure and Urban Greening Factor (UGF), and also the strategic opportunities highlighted in part B(6)

iv. waste and utilities capacity related to the scale of growth, net-self-sufficiency, healthy waterways and zero-carbon ambitions, notably: connections to new reservoirs and water transfer projects in the wider south east; the Teddington Direct River Abstraction; heat networks and connecting transmission infrastructure within heat network zones; and energy and water-efficiency measures set out in policies MBUL4 Utilities – capacity, connectivity and resilience and GHR1 Energy-Efficiency

v. flood risk mitigation, accounting for climate change, suitable for the expected lifetime and vulnerability of affected areas – notably those set out in the TE2100 plan and its updates, and the on- and offsite drainage interventions identified to be necessary as part of the London Surface Water Strategy and related action plans

vi. additional burial space in line with policy HN10 Burial space.

vii. additional strategic healthcare, emergency services and criminal justice infrastructure, commensurate with expected housing-related population and spatial growth to ensure appropriate access, capacity and coverage as set out in Annex F.

(6) help realise the identified strategic opportunities for nature recovery, enhanced access to green space, and cleaner, healthier waterways reflected in Environmental OAs through site allocations, spatial policies and appropriate developer contributions that secure connected and multi-functional green and blue infrastructure

(7) make provision for future strategic growth beyond the existing built-up area through safeguarding land identified as Candidate Future BLGs, and additional land in Green Belt BLGs indicated to have potential future capacity; and by positively engaging with further work on infrastructure dependencies and cross boundary opportunity

(8) facilitate delivery of this strategy through policies and site allocations that optimise value generation and delivery through phasing, use, layout, housing mix and other expectations (including Community Infrastructure Levy (CIL) rates) that are carefully evaluated for their cumulative delivery impact.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

2.9 Statutory Development Plans will need to address the different components of growth and change locally to make best use of land, as set out on the key diagram (as well as through small sites and windfall opportunities).

2.10 Specific strategic opportunity will relate to sustainable access (including to town centre facilities), connectivity within and beyond London, the presence of strategic economic clusters, the scale of opportunity sites and/or planned changes to any of these. It includes making the most of opportunities around stations (as emphasised in the NPPF), across London, and capitalising on key gateways in the CAZ.

2.11 Some aspects of strategic opportunity may be more evident in the thematic sub-diagrams and also BFOA visions in Annex E. While this strategic opportunity is predominantly brownfield, some extends into the Green Belt and, may also interact with opportunity that extends beyond London given shared transport corridors and natural corridors and catchments that cross boundaries.

2.12 This will include instigating managed release of employment land and Green Belt as set out in policies GLE2 and PV7 Sustainable development and enhancement of the Green Belt. This policy establishes that the Green Belt release associated with those BLGs is acceptable in principle because it is necessary to meet objectively assessed needs for homes and employment-generating uses.

2.13 Safeguarded land is land that is not yet formally allocated; a future version of the plan will confirm further spatial development requirements in order to continue the trajectory to 850,000 homes. In the interim, it is to be protected from speculative development that could undermine its optimisation. Much will be contingent on the scoping and development of further transport infrastructure interventions and other work to address further mitigation of key constraints.

2.14 In referring to the need for intensification, this includes both urban form, but also the extent to which land, infrastructure and buildings are used across the 24-hour period, the week and the calendar year. As such reference to intensification in A(2) and B(4) includes intensification of the existing use, as well as land use change, which may include (pro-active) loss of certain uses that are poor uses of well-connected land such as carparks.

2.15 Supporting places to renew and evolve means making the best use of land and existing and emerging assets, particularly where there are enhancement/public benefit opportunities. This will typically involve the development of positive place-visions that factor in place assets. These include natural, cultural, historic, infrastructural, (including the strategic sustainable transport and environmental opportunities highlighted in A(1))

and economic (such as the successful economic clusters that are a key link to London's Growth Plan) assets.

2.16 In some cases, associated policies, and updates to the strategies and action plans referenced will refine the infrastructure requirements listed and shown on the key diagram(s) or as subsequently updated via the Annual Monitoring Report (AMR). It is also expected that the London Infrastructure Framework will be updated to account for the over-arching needs of the additional growth planned, so should be referred to when published. Where infrastructure capacity is referenced, the role of adequate management and maintenance of existing assets alongside new 'kit' will also need to play an important role. Infrastructure needs for good growth also include those that benefit resilience, carbon, air quality, health, inclusion and equality of opportunity.

2.17 The cumulative impact of policy and site-based expectations and CIL charging schedules can make a difference to overall viability and speed of build-out as indicated by the London Plan viability testing. Plan-making authorities should be mindful in the round of cumulative impacts on viability and there should be a proportionate and prioritised approach that avoids undermining delivery, which is reflected in A(4), A(5) and B(8). For instance A(5) reflects that in some cases specialist housing (Purpose-Built Student Accommodation (PBSA) or Large-scale Purpose-built shared-living (LSPBSL) accommodation without their applicable affordable housing requirements in early phases may help build scheme value and deliverability; and that CIL charging schedules can presently penalise higher-density development. It also highlights the need to ensure and enable efficient layouts e.g. in terms of net to gross ratios.

Rationale

This policy reflects a number of key considerations:

2.18 It sets out London's overall vision for good growth, and the different requirements and components of change that must be part of the spatial strategy if we are to meet objectively assessed needs. It highlights the key parameters to be attended to, and – where prioritisation is necessary – what this should reflect.

2.19 This approach is necessary to ensure that London's growth is sustainable and minimises adverse impacts. If growth does not make the best use of land, does not happen in the right locations and is not underpinned by the requisite infrastructure it will result in the loss of much more Green Belt land; far higher levels of congestion; significant environmental costs; and ultimately, less housing overall.

2.20 It is important that all plans work together to secure delivery of the scale and nature of growth intended. The infrastructure requirements listed are as specific as best available information allows, including impact testing of the Plan and other evidence and linked to the Plan's Good Growth Objectives.

2.21 As well as providing for the 10-year growth against which housing targets are set and other growth is aligned, the policy puts in place a direction of travel for longer-term growth. This is intended to support positive planning for future capacity, around which firmer propositions can be built over time and integrated in future plan iterations. As set out in chapter 1, it is not possible to go further than this at this stage.

2.22 In some cases, longer-term growth may be focused on corridors where improvements will benefit an area that extends beyond London. The Mayor is keen to work with

neighbouring authorities e.g. in order to make the most of transport investment but given the Mayor's jurisdiction is limited to the administrative boundary, it may be most appropriate for the government to facilitate cross-boundary coordination.

MBUL2 Optimising the use of land and site capacity

Policy aim: To ensure development makes the best use of land and to make the most of all opportunities on brownfield land

Applies to: All local plans and all development

Locations: All

Plan-making

A Plan-making authorities should plan for growth and make the best use of land in line with Box MBUL2, taking full advantage of existing and planned levels of sustainable transport connectivity and allowing character to evolve by:

(1) Developing strategies, design guides, design codes and/or masterplans that set clear expectations on scale, height, and form of development (and other parameters as relevant) for areas where a more pro-active approach is required to promote development. These should have regard to the Optimisation Framework in Table 2.1 and ensure that minimum net densities are met or exceeded.

(2) Where appropriate, undertaking or updating character studies to understand local character in more detail. This could include enhancing the precision of the London Context Map and adjusting the setting applied to a particular location based on detailed local knowledge. These studies should not preclude change, especially where an increased scale or density of development is expected in accordance with box MBUL2.

(3) Where they consider necessary, building on the London Small Site Design Code in a local design code. In doing so this should not deviate from the overall scale and ambition set out in the London Small Site Design code or undermine development viability through additional requirements or constraints.

B Plan-making authorities should enable greater clarity for developers and faster delivery of homes through the following:

(1) Making Local Development Orders (LDOs) including for small sites.

(2) Identifying and allocating appropriate small sites for residential development. This should include listing these small sites on Part 2 of their brownfield registers and in doing so, providing clarity that they are afforded Permission in Principle.

(3) Identifying opportunities to combine smaller sites under one site allocation where this would increase capability for mid-rise development (12m up to but excluding 30m in height)

Development management

C All development should with reference to Box MBUL2, optimise the use of land in line with the spatial strategy set out in MBUL1, while responding to the site's specific context

and constraints. This means:

(1) Development should be informed by the relevant density and height ranges in the Optimisation Framework where applicable (see Box MBUL2). Residential development should achieve the minimum densities stated in the Optimisation Framework, unless site specific constraints limit the development potential of the site. Development that complies with the Optimisation Framework should be supported in terms of height and density.

(2) Development proposals on sites below 0.25ha that meet the requirements of the London Small Site Design Code (or a rearticulated small sites design code prepared by plan-making authorities where applicable) are acceptable in-principle.

(3) Failure to meet the requirements of this policy should be given very significant weight in planning decisions.

Box MBUL2

Site optimisation for particular locations and sites is defined by the parameters set out in the following:

a. Design codes, masterplans and site allocations with design parameters prepared by LPAs in accordance with the approach of this Plan. This includes the London Small Site Design Code (or as refined by LPA in local design codes and pattern books).
b. Opportunity Area Planning Frameworks (OAPFs) where they contain relevant density, height or other capacity guidance.
c. Local plan defined locations and policies for building of 30m and above in height (see MBUL3 Tall buildings).
d. Policy PV7 for sites in the Green Belt.

The Optimisation Framework

Where a site is not covered by a) to d) above, the Optimisation Framework in Table 2.1 applies for sites over 0.25 ha which are within Sustainable Access Measure (SAM) 2 and above. The height and density ranges in this table should be used to guide the proposed form and scale of development, via the following process:

e. Identify the assumed height range and density for a site as set out in the Optimisation Framework.
f. Identify the area's potential and/or sensitivity to change to inform where in the range is optimum.[20]
g. Develop a site-specific design response, taking into account e) and f) above.

[20] Where an LPA hasn't identified an areas potential for change, the presence of heritage assets such as conservation areas and/or listed buildings may indicate that the form and massing may be expected to be towards the lower end of the relevant range.

Table 2.1: Optimisation Framework

Context Setting	SAM 2	SAM 3	SAM 4	SAM 5A	SAM 5B
Setting A	3 - 4 storeys 220 - 410 hr/h	3 - 5 storeys 280 - 510 hr/h	3 - 6 storeys 340 - 610 hr/h	3 - 7 storeys 440 - 750 hr/h	4 - 7 storeys 500 - 830 hr/h
Setting B	3 - 5 storeys 260 - 480 hr/h	3 - 6 storeys 330 - 580 hr/h	3 - 7 storeys 400 -680 hr/h	4 - 7 storeys 500 - 830 hr/h	4 - 8 storeys 510 - 910 hr/h
Setting C	3 - 5 storeys 300 - 530 hr/h	3 - 6 storeys 370 - 640 hr/h	3 - 7 storeys 440 - 750 hr/h	4 - 8 storeys 490 - 900 hr/h	5 - 9 storeys 550 - 990 hr/h
Setting D	3 - 6 storeys 370 - 650 hr/h	4 - 7 storeys 420 - 760 hr/h	4 - 8 storeys 470 - 880 hr/h	5 - 9 storeys 590 - 1040 hr/h	5 - 10 storeys 600 - 1130 hr/h
Setting E	4 - 7 storeys 420 - 710 hr/h	4 - 8 storeys 440-830 hr/h	5 - 9 storeys 490 - 950 hr/h	5 - 10 storeys 550 - 1080 hr/h	5 - 11 storeys 610 - 1170 hr/h
Setting F	4 - 8 storeys 450 - 830 hr/h	5 - 9 storeys 520 - 950 hr/h	5 - 10 storeys 560 - 1080 hr/h	5 - 11 storeys 650 - 1220 hr/h	5 - 12 storeys 650 - 1300 hr/h

It may be acceptable to exceed the heights and densities expressed in the table above, particularly in better-connected locations. Where the height range in the Optimisation Framework exceeds 30m, applicants should follow Policy MBUL3 (Tall Buildings) to identify whether the proposed height is appropriate.

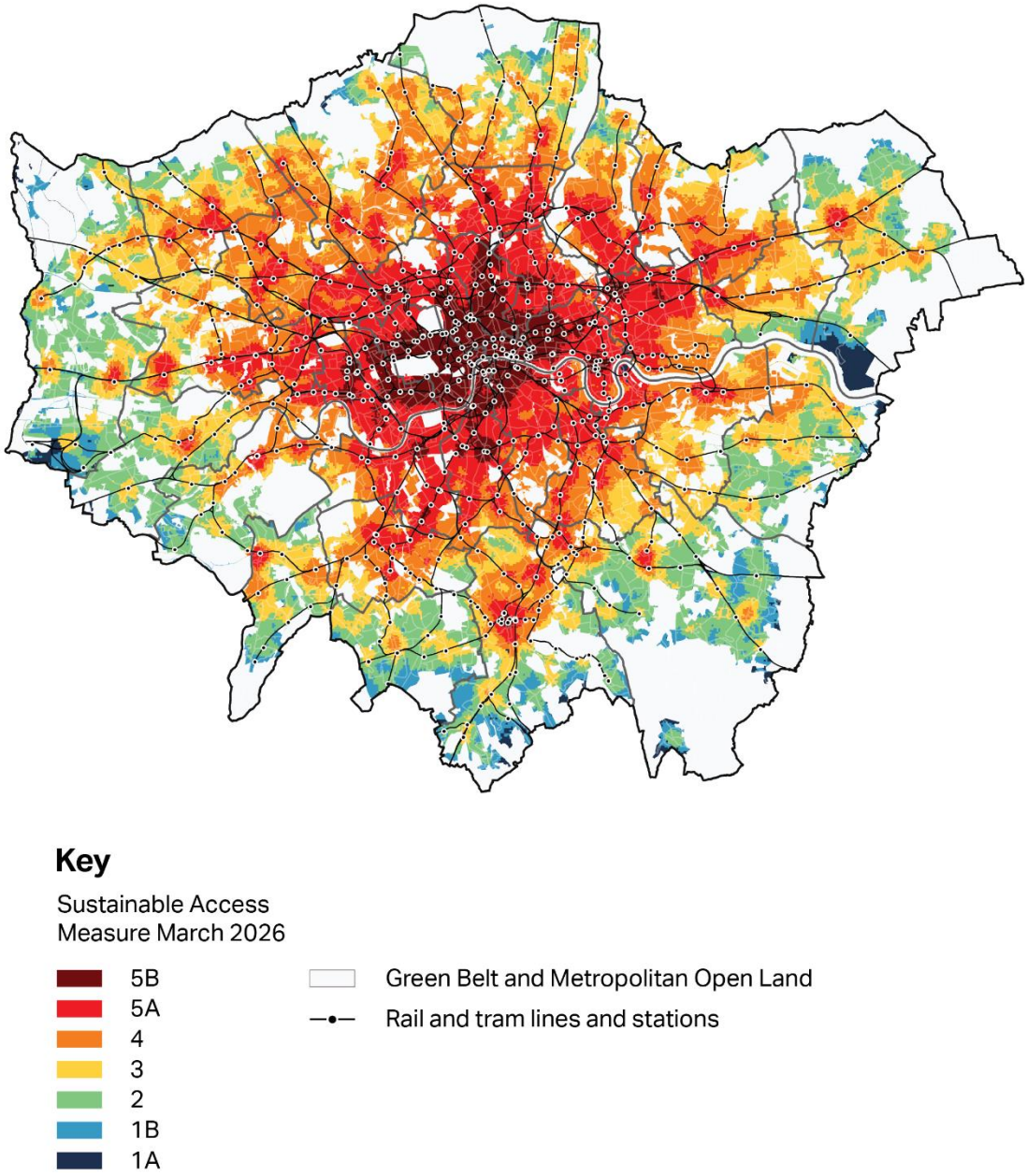
Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

Optimisation

2.23 The Optimisation Framework uses the SAM (see Figure 2.4) and character settings shown on the London Context Map (Figure 2.5). The SAM level and setting of a site can be found using these maps which are online here: Planning Data Map.

Figure 2.4: The Sustainable Access Measure (SAM)



The SAM is a measure of different travel times to jobs, services and amenities by public transport and walking. It was developed by TfL to inform land use policy and ensure integration with transport planning within London.

2.24 The Optimisation Framework provides a recommended net residential density range (in habitable rooms per hectare) that is expected for different settings and SAM levels within London. The density range is complemented by an indicative height range (in storeys) for the different locations within Table 2.1 as well as guidance below on site coverage. There may be site-specific design responses that achieve the requisite overall densities in different ways.

2.25 Net residential densities should be calculated in line with the government's Design and

Placemaking Planning Practice Guidance; and should not be used interchangeably with gross densities. If comparisons between net and gross densities are desired, the net densities in Table 2.1 will need to be adjusted to accommodate a site's gross site area.

2.26 The appropriate density and height for development within the range will be informed by a number of factors, such as how sensitive to change an area is. There may also be more granular aspects of transport connectivity and development viability than can be reflected in the Optimisation Framework that might influence form and density. Boroughs may assess certain areas as more sensitive to change, with appropriate densities potentially towards the lower end of the range, but it is not expected that this is a default position across large parts of a borough, and it must be informed by a robust assessment.

2.27 Sites within OAPFs, designated tall building areas and areas being masterplanned may support higher densities and building heights than those in the Optimisation Framework for that location.

2.28 The density range is the product of the indicative height and typical site coverage for the relevant location. The density range will not be relevant for non-residential sites or forms of non self-contained residential accommodation. For these sites the indicative height range and guidance on site coverage stated in the Optimisation Framework should guide site optimisation.

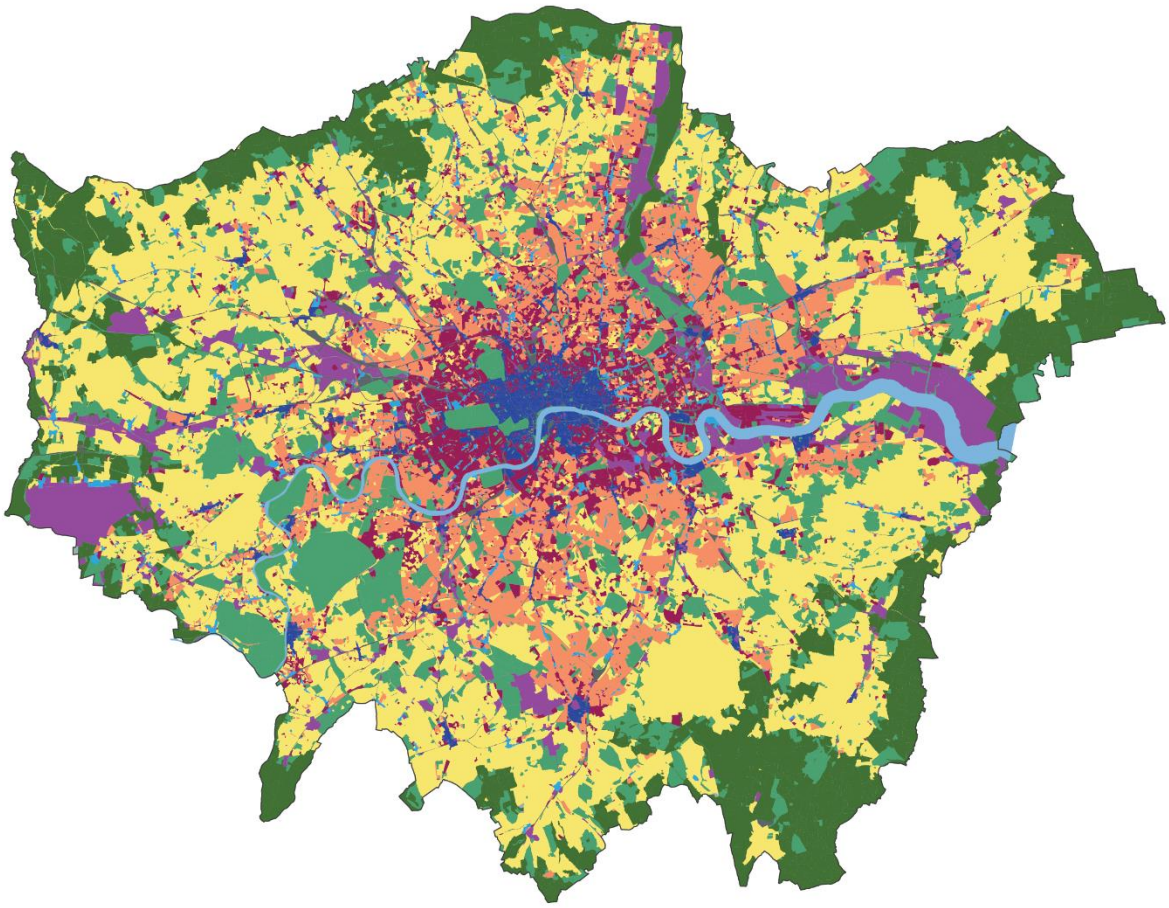
The London Context Map and local character studies

2.29 The London Context Map categorises each built-up area of London into one of six overarching settings (locations with a predominantly similar character) which provides a high-level description and understanding of London's character. The mapping takes a typological approach to character, it does not differentiate between areas of the same setting which are more or less sensitive (such as the presence of heritage assets).

2.30 While the settings have been defined and mapped on the London Context Map, the boundaries of these settings may change over time (or as a result of evidence base updating by plan-making authorities).

2.31 LPAs can complement this through more detailed local studies (or revise existing character studies where needed to provide more detail, improve precision and reflect changes due to recent development). These studies can further inform planning for growth and identifying the varying sensitivity of different areas, but they should not seek to reduce ambition or deviate from the overall scale of ambition needed.

Figure 2.5: London Context Map



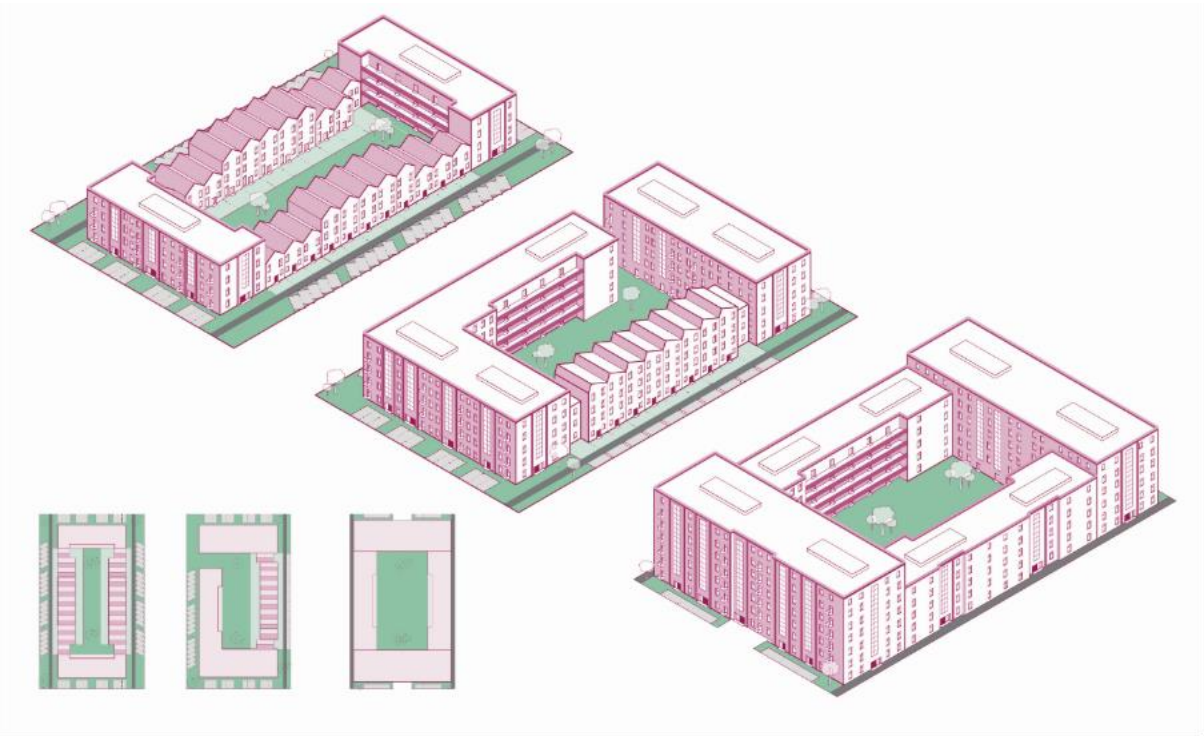
KEY

- Setting A — Predominantly outer suburban
- Setting B — Predominantly inner urban terrace
- Setting C — District and local centres
- Setting D — Predominantly flatted development
- Setting E — Large town centres and central core
- Setting F — Low density land
- Green and Blue Infrastructure
- Greenbelt
- Other Infrastructure
- Transport Infrastructure

Site coverage

2.32 New development should be designed to achieve a compact and connected form of development that supports walkability and contributes to successful, well-functioning places. This involves having an efficient building layout, which can reduce overall development costs and improve viability. The following illustrations in Figure 2.6 are indicative only and show how this may be achieved at different levels of public transport connectivity.

Figure 2.6: Illustrative massing depicting how site coverage can change at different levels of public transport connectivity



2.33 For schemes that provide car parking, the use of podiums and basements may be appropriate in order to reduce impacts on the walkability and public realm of a scheme. Where this is designed in, the building frontage should be kept active and not dominated (visually or physically) by cars.

Small sites design code

2.34 The Mayor will be producing and consulting on a London Small Sites Design Code, that when finalised will apply in line with this policy. It will identify site types common across London which are suitable for residential intensification. To provide clarity on acceptable design responses, the London Small Site Design Code will set a number of design requirements to be met for each site type.

2.35 The coding parameters in the London Small Site Design Code will have focus on the strategic design requirements for each site type. They do not assume a specific architectural style.

2.36 To streamline the planning process, LPAs are encouraged to make LDOs that embed the London Small Sites Design Code (or locally specific code) within them. This provides planning permission for sites covered by the LDO, when applying the design code that is

contained within the LDO

2.37 Where it is considered necessary, plan-making authorities may choose to issue a local design code for small sites that more directly applies particular design aspects for their plan area. This may be because a local authority may wish to take into account locally specific characteristics and contexts that aren't addressed in the London Small Site Design Code. LPAs may also choose to code for a specific architectural style that relates to the specific character type in which it is located. Where an LPA produces a design code or guide, these should not be overly long or complicated or add undue burdens to development. Where a more detailed approach is sought, this should generally be brought forward via an LDO.

Rationale

This policy reflects a number of key considerations:

2.38 This policy sets out what site optimisation means in different contexts across London, building on the approach to optimisation established in the NPPF. It does this primarily via the Optimisation Framework which provides a strategic approach to the optimisation of sites within the existing built-up areas of London. This is the crux of the spatial strategy and the ability to make best use of land. Its application is key to the deliverability of the housing targets and ensuring that development is sustainable.

2.39 The strategic approach is critical in order to make the most of all the opportunities on brownfield land. The densities in the framework necessarily go beyond the minimum set in the NPPF (as allowed and supported by that policy) in order to reflect both the greater opportunities and housing needs in London. The Optimisation Framework also sets a more generally applicable approach across boroughs to ensure that all parts of London play an appropriate role in meeting housing need. Otherwise, it is likely that individual boroughs – acting separately and from their local perspective – would not optimise these opportunities that collectively are vital to help meet housing need for London as a whole and to do so in a way that avoids disproportionately impacting on some areas and communities.

2.40 The minimum densities and indicative heights and density ranges in the Optimisation Framework embed the link between density and transport connectivity. It utilises the Sustainable Access Measure which is a London-specific connectivity tool to direct higher density development to the most appropriate locations based on access to services and amenities by sustainable transport. It has been developed to account for London's particular circumstances and indicates that minimum densities in London should exceed those set out in the National Planning Policy Framework

2.41 The framework provides greater clarity and certainty to developers and decision makers on the scale of development that is acceptable and expected in different locations across London and builds on the approach set out in national policy to promote development near rail stations. It should help speed up planning process and avoid underutilisation of development sites.

2.42 Mid-rise development of four to nine storeys is a key focus in the Optimisation Framework and will need to be delivered across many more parts of London. This form of development has many advantages over other types (and scales) of development; and has a vital role in sustainably delivering more homes in London. These advantages include the ability to create walkable and dense neighbourhoods, while being able to integrate well

into London's existing streets and neighbourhoods. They can work well for families with young children; and can have lower construction and maintenance costs compared to taller buildings.

2.43 The production of a London Small Site Design Code aims to reduce delays and risk of small site development across London and maximise their potential as a source of new housing. In line with the NPPF it uses common design principles that illustrate opportunities for making more effective use of land. By establishing consistent development parameters across London, the Code will seek to ensure that the collective potential of these sites is realised through coordinated, high-quality development rather than ad-hoc, piecemeal delivery. By having a design code that clearly covers the site types found in London, it is possible to provide a greater level of clarity and certainty to applicants and decision makers on the redevelopment of these sites rather than a generic approach to small sites which does not take into account the differences in the types of small sites across London and the potential of these sites.

2.44 If we do not make the most of all the opportunities on brownfield land there will be pressure to release further Green Belt land and adverse environmental, congestion and health impacts will increase.

MBUL3 Tall buildings

Policy aim: To set an appropriate framework for tall building development.

Applies to: All local plans and all development 30m and above in height

Locations: All

Plan-making

A Plan-making authorities should:

(1) undertake an assessment and identify areas that are more or less sensitive to tall buildings.

(2) identify the locations that may be appropriate for buildings of 30m and above in height (or at a higher threshold if locally appropriate) using the criteria in Box MBUL3 and assessment carried out as part of A(1)

(3) incorporate the locations (within their areas) for metropolitan tall buildings identified in Table 2.2 and Figure 2.7 for buildings of 100m and above

(4) define the boundary of the locations in parts (2) and (3) and set appropriate or maximum heights for these areas in local plans based on local evidence.

Development management

B Tall buildings should meet the locational and design criteria set out below:

(1) Tall buildings should be directed to the locations that the plan-making authority has identified in the local plan as appropriate in principle for buildings of this height.

(2) Development of 100m and above in height should be limited to the locations

identified in Table 2.2, as defined by the plan-making authority in their local plan.

(3) Where a plan-making authority has not identified appropriate locations for tall buildings in their local plan, or if a tall building is proposed outside of a location identified in a local plan or in Table 2.2, the criteria 1(ii) and (iii) (and for buildings over 100m also criteria 2 (vi) and (vii)) in Box MBUL3 should be considered when determining if the location is acceptable in height terms. Robust justification is expected for any conflict with these criteria.

(4) Development proposals of 30m and above in height (approximately 10 storeys and above), should meet the following criteria:

i. Be of exemplary design and architectural quality.

ii. Make a positive contribution to the existing and emerging skyline where a building is prominent and not cause unacceptable harm to local or strategic views.

iii. Where part of a cluster, support it to be physically distinct and visually separate on the skyline from other clusters.

iv. Respond to the existing or emerging spatial hierarchy of the local and wider context to aid legibility and wayfinding.

v. Address the strategic preference for building heights to be greatest towards the centre of a cluster and stepping down towards the edges and ensure appropriate transition in height (where the edges of the site are adjacent to buildings of significantly lower height).

vi. Individually and in combination, protect and enhance the open quality (including views) of the river Thames and the riverside public realm and not contribute to the visual enclosure, canyoning or dominance of tall buildings along the river.

vii. Be designed to minimise light pollution from external lighting and avoid decorative external lighting above the base of the building unless in accordance with a LPA's lighting strategy.

viii. Not, including during their construction, interfere with aviation, navigation or telecommunication

ix. Avoid a significant detrimental effect on solar energy generation on adjoining buildings.

x. be designed for personal safety at height including suicide risk

xi. incorporate free to enter publicly accessible areas in the most prominent tall buildings in London, where this is considered appropriate by the LPA. This area should normally be located at the top of the building to afford wider views across London.

C Isolated tall building should only be considered where they clearly mark a place of particular functional or spatial significance and respond proportionately in height to their context or where they are replacing existing tall buildings.

Box MBUL3 Tall building location criteria

Criteria for identifying tall building locations at the local plan-making stage:

1. Tall buildings (30m and above in height) should be directed to areas that meet all of the following criteria:
    i. are identified for significant growth or change in a local character study, local plan or area strategy
    ii. have very good sustainable transport connectivity (generally assumed to be SAM 4 or above)
    iii. are not unduly sensitive to the impacts of tall buildings, of the envisaged scale
    iv. have an existing or emerging townscape character that can in principle accommodate tall buildings (for example locations where there are existing tall buildings, or areas subject to comprehensive planning through a framework or masterplan).
2. Metropolitan tall buildings (100m and above in height) should be directed to the metropolitan clusters identified in Table 2.2. Outside of these identified locations, other locations for buildings of this scale should only be considered appropriate where all the following criteria have been met:
    v. points i – iv above
    vi. it forms part of an existing or planned cluster of tall buildings designated by the LPA.
    vii. it provides a proportionate response to the height and shape of the tall building cluster.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

2.45 This policy measures tall buildings from the ground level to the roofline of the building, including any rooftop equipment, but excluding any masts (see Figure 2.7). Where a proposal is submitted at the planning application stage, the height above ground level can be supplemented with heights expressed as an Above Ordnance Datum (AOD) level.

Figure 2.7: Definition of low-rise, mid-rise, tall building and metropolitan tall buildings

2.46 Three tiers of metropolitan tall building clusters are identified:

- metropolitan tall building cluster – established or emerging confined skyline feature
- major metropolitan tall building cluster - major skyline feature
- international tall-building cluster – significant skyline feature and London's globally recognised primary financial and business locations.

2.47 Plan-making authorities are responsible for identifying the location of buildings between 30 and 100 metres. In identifying appropriate locations, the sensitivity analysis undertaken as part of character studies helps identify where taller buildings will be more or less appropriate. Plan-making authorities can use this evidence as well as local and strategic views (see PV8 Strategic and local views) to identify where the development of buildings of 30m and above in height may be appropriate. Where the prevailing building height is near or above 30m plan-making authorities can use a higher building height threshold to plan for.

2.48 In undertaking this process, plan-making authorities should utilise the assessment of areas that are more or less sensitive to tall buildings required by Part A(1), to articulate any harm that could be caused by buildings outside of those areas deemed appropriate, so that it can be used in the decision-making process.

2.49 The use of 3D modelling software can support in determining the potential impacts of tall building development, both at a plan-making and development proposal stage. This helps to understand the visibility of a building from its surroundings, and to determine appropriate locations and their heights.

2.50 Where the London Plan or a local plan has identified a location as appropriate for tall buildings, this does not mean that all buildings up to this height are automatically acceptable in the identified locations. Such proposals will still need to be assessed in the

context of site circumstances and other development plan policies to ensure they do not lead to unacceptable impacts on the local area.

2.51 The cluster-specific guidance in Table 2.2 sets out the area covered for each location. Where the plan-making authority has identified locations for buildings 100m and above in height in its current local plan within the locations identified in Table 2.2 these should be used as the boundary of the metropolitan tall building clusters, until any revisions are made to them through a new local plan.

2.52 For some locations Table 2.2 highlights specific constraints from strategic views, but it does not identify all implications of strategic views. Other metropolitan tall building locations are near to or overlap locations covered by London's strategic views. In these instances, metropolitan tall buildings may be appropriate providing they do not conflict with the London View Management Framework (LVMF) (see PV8 Strategic and local views).

Table 2.2: Locations where metropolitan tall building may be appropriate

Metropolitan cluster tier	**Location (see also on Figure 2.8)**	**Cluster specific guidance**
International cluster	1. Canary Wharf	This location refers to the area towards the north of the Isle of Dogs broadly defined by the River Thames to the west, Aspen Way to the north, Trafalgar Way and Blackwall Basin to the east and Marsh Wall to the south and extending southward along Millwall Inner Dock to Lighterman's Road.
International cluster	2. City of London	This location refers to the City Cluster broadly defined by Bishopsgate in the west, Houndsditch to the north and Stoney Lane and Fenchurch Street to the east and south.
Major Metropolitan cluster	3. Croydon	This location refers to the area around East Croydon Station and either side of Wellesley Road.
Major Metropolitan cluster	4. Greenwich Peninsula	This location refers to the Greenwich Peninsula Central area which extends from John Harrison Way northwards towards the O2.
Major Metropolitan cluster	5. North Acton / Old Oak Common	This location refers to the area around Old Oak Common Station, Acton Wells and North Acton.
Major Metropolitan cluster	6. Old Kent Road	This location refers to the area extending alongside Old Kent Road from its junctions with Rotherhithe New Road and Peckham Park Road in the north-west to its junctions with Asylum Road and Gervase Street to the

		south-east. Building heights should avoid adverse impacts on the strategic views to St. Paul's Cathedral from Parliament Hill and Kenwood as well as to the Palace of Westminster and Westminster Abbe from the Serpentine Bridge.
Major Metropolitan cluster	7. Stratford	This location refers to the area around Stratford and Stratford International Stations. Building heights should avoid adverse impacts on the strategic view to St. Paul's Cathedral from the King Henry VIII's Mound.
Major Metropolitan cluster	8. Vauxhall	This location refers to the area extending to either side of the railway line from Vauxhall Station in the north to Wyvil Road in the south. Building heights should avoid adverse impacts on the strategic views to the Palace of Westminster and Westminster Abbey.
Metropolitan Cluster	9. Blackfriars	This location refers to the area either side of Blackfriars Road from the River Thames in the north to Burrell Road / Colombo Street in the south.
Metropolitan Cluster	10. Blackwall	This location refers to the area east of Blackwall Station and to either side of Aspen Way.
Metropolitan Cluster	11. Canada Water	This location refers to the area south-east of Canada Water Station.
Metropolitan Cluster	12. Elephant and Castle	This location refers to the areas south-west of Elephant and Castle Station and at Borough Road / Newington Causeway. Building heights between these two areas to be lower to avoid adverse impacts on the strategic view to the Palace of Westminster and Westminster Abbey from the Serpentine Bridge.
Metropolitan Cluster	13. Lewisham Town Centre	This location refers to the area adjacent to Lewisham Station. Building heights should avoid adverse impacts on the strategic view towards Greenwich World Heritage Site from Island Gardens.
Metropolitan Cluster	14. Millwall Stadium/ Surrey Canal Road	This location refers to the area south-east of South Bermondsey Station and extending to Surrey Canal Road adjacent to the Millwall Football Stadium.

Metropolitan Cluster	15. Old Street	This location refers to the area east and north-east of Old Street Station. Buildings should not be visible in the strategic views of St. Pauls Cathedral from Bankside.
Metropolitan Cluster	16. Twelve Trees/West Ham	This location refers to the area south of the railway line, east to west, from West Ham Station to Crows Lane.
Metropolitan Cluster	17. White City	This location refers to the area immediately to the east of White City and Wood Lane Stations.

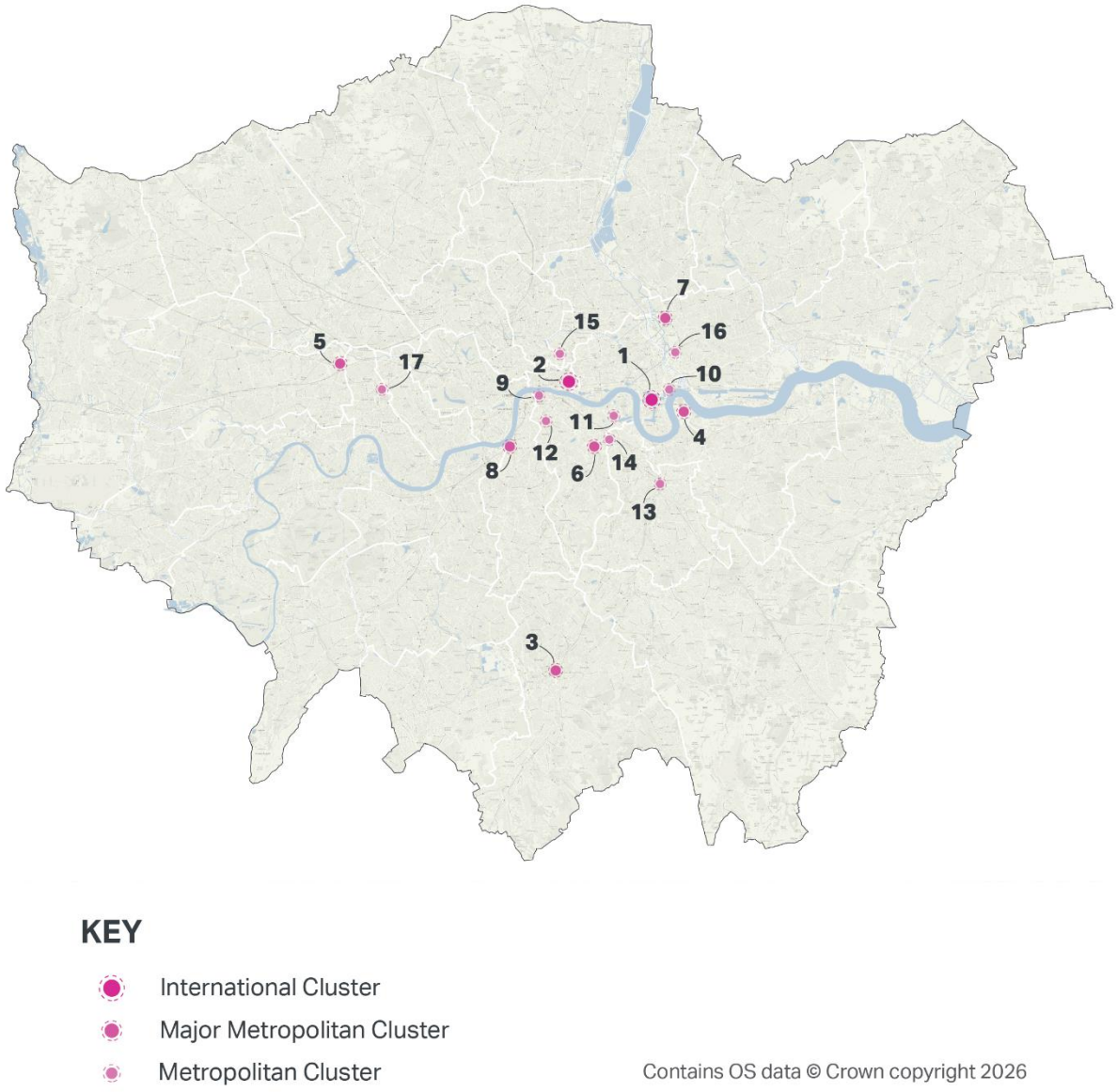


Figure 2.8 Locations where metropolitan tall buildings may be appropriate

2.53 In addressing the design requirements in part B(4) the greater the height of the building,

the more important meeting these requirements becomes and the greater the level of scrutiny that is required for its design.

2.54 Any external lighting for tall buildings should be minimal, energy-efficient and designed to minimise glare, light trespass, and sky glow, and should not negatively impact protected views, or the amenity of nearby residents. The internal lighting within tall buildings should also be carefully designed to minimise light pollution and positively contribute to nighttime views.

2.55 Where publicly accessible areas (including viewing areas on upper floors of buildings) are provided as a public benefit of the development, they should be freely accessible and in accordance with the Public London Charter; and in addition to any street level public realm requirements.

Rationale

This policy reflects a number of key considerations:

2.56 A contributing factor to London's global image is its landmarks and skyline. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity.

2.57 However, in inappropriate locations and/or where they are of poor-quality design, they can also have detrimental visual, functional and environmental impacts so a framework for managing these buildings is important.

2.58 Therefore, to ensure that tall building development is in appropriate locations and designed to be of the highest architectural standard, this policy sets out a framework for managing the location and design of these buildings. Buildings over 100m in height are of strategic importance because of their wide visual impact and the influence they have on London's skyline and global impact. This policy directs these tall buildings to the most appropriate locations.

MBUL4 Utilities – capacity, connectivity, and resilience

Policy aim: To support the evolution and development of utility systems that provide the backbone for enabling good growth in London

Applies to: All local plans, major development, and some smaller-scale development depending on scale and location of development.

Locations: All

Plan-making

A Local plans should:

(1) use the latest information on infrastructure deficiencies and requirements (as set out in MBUL1 Spatial Strategy plus Box MBUL4[21]) to proactively identify the relevant

[21] Or as amended by supporting implementation guidance and templates

opportunities and acceptable design solutions that can address these and ensure the strategic sufficiency of utilities infrastructure

(2) reflect these needs and opportunities and remaining constraints in site allocation requirements and other spatial and design policies.

Development management

B Development proposals as specified in Box MBUL4[22] should contribute positively to the strategic sufficiency of utilities infrastructure in a manner proportionate to the scale and type of development. This means they should:

(1) incorporate appropriate demand management, supply and distribution infrastructure and other measures (to relevant minimum standards where specified) to meet system needs, informed by relevant information and strategies including, where appropriate, engagement with providers or coordinators

(2) ensure suitable information is made available in a timely manner to support planning for utilities, connections and infrastructure upgrades.

Box MBUL4 Relevant providers and coordinators, information and strategies and system needs (Infrastructure, building-design and phasing measures and standards) by utility type

Energy:

Providers and coordinators are:

- The National Energy Systems Operator (NESO) – system planner which also handles connection to electricity transmission infrastructure.
- Local Distribution Network Operator (DNO) for electricity connections to the distribution network (SSEN and UKPN)
- National Grid – for transmission infrastructure,
- If within a Heat Network Zone or >100MW heat load, the Zone Coordination Body[23] for heat supply/capture (which will be the liaison point with network operators).
- Gas Distribution Network operators (SGN & Cadent) – in relation to legacy gas infrastructure and future hydrogen supply.

Information and strategies are:

- Self-serve web-based information and where necessary, advice from providers and coordinators and the GLA
- The London Infrastructure Framework
- The Local Area Energy Plan(s) (LAEP) for the area and LAEP Datahub

[22] Or as amended by supporting implementation guidance and templates

[23] Until regulations are introduced to designate this, the LPA should be the point of contact

- The Regional Energy Strategic Plan
- Outputs of the Heat Network Zoning Model
- Mapping from the Health and Safety Executive of major hazard sites
- For development proposals, the local plan where this advances this policy, plus the evaluation of low-carbon heat options as required by Policy GHR2 Low cost low carbon heat, may also be relevant.

Infrastructure and site building level measures include:

- Microgeneration and storage capacity;
- Waste heat capture, storage and distribution provision (in line with policy GHR2)
- Electricity distribution and transmission equipment;
- Smart meters, energy-efficient fabric and fittings and design approaches to reduce energy requirements;
- Phasing development to align with the timelines for strategic infrastructure upgrades

Standards expected are set out in GHR1 in respect of energy-efficiency, and overall the expectation is that measures should ensure sites are integrated with the wider energy system for their mutual benefit in respect of costs, flexibility and resilience.

Water and sewerage:

Providers and coordinators are:

- Statutory Water Undertakers (Thames Water, Affinity, SES, Essex for drinking water)
- Statutory Sewerage Undertaker (Thames Water)
- Local Lead Flood Authority (part of the local authority, in respect of drainage)

Information and strategies are:

- Advice from providers and coordinators;
- Sub-regional Integrated Water Management Strategy (IWMS where available, or other area-based IWMSs)
- Water companies' business plans.
- For development proposals, the local plan where this advances this policy, plus the calculation of the equivalent greenfield runoff rate and identification of measures to achieve it in line with Policy GHR4 may also be relevant.
- Enabling Water Smart Communities evidence[24] can help inform assessment of appropriate water efficiency measures.

Infrastructure and other measures are:

[24] Enabling Water Smart Communities (EWSC)

- Provision for managing and storing surface-water and improving water quality in line with policies GHR 4 and GHR 9
- Wider water and sewerage distribution, transfer and processing equipment
- Water efficient fixtures and fittings preferably incorporating reuse of grey water at least externally
- Drought resistant planting in line with policy GHR6.

Standards expected for all developments are a mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption) (residential), or at least BREEAM excellent standard for the 'WAT 01' water category or equivalent (non-residential), and minimisation of misconnections. A Building regulation Part G fittings approach should be taken to establish this. Local plans may vary these water efficiency standards where an evidence base to justify this has been provided through their sub-regional IWMS. Policies GHR4 and GHR9 also provide water quality and drainage capacity expectations.

Digital:

Providers and coordinators are:

- Fibre network providers (wholesale and independent) or equivalent;
- Mobile network operators with some coordination provided by the trade body, Mobile UK.

Information and strategies are:

- Service availability mapping (for fixed digital[25])
- Advice from providers regarding mobile system connectivity, capacity and resilience and existing infrastructure assets
- For local plan preparation, a review of telecom application refusal reasons
- For development proposals, the local plan where this advances this policy and for tall buildings over 30m an interference assessment reviewing lines of sight impact of nearby rooftop mobile masts (as per policy MBUL3) may also be relevant. Telecom application refusals reasons may also provide insights.

Infrastructure and measures:

- Fixed wires, masts and signal boosting technologies
- Ducting and access
- Building fabric and positioning accounting for their potential impact on signal interference
- Provision for continuity of service (including signal quality) where a site incorporates existing infrastructure.

[25] See e.g. London Connectivity

Standards expected are that all development should provide sufficient digital connectivity throughout the development to meet the needs of all potential end users, which may include people in surrounding spaces affected by mobile signal and public wifi provision.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

2.59 The policy reflects the concept of strategic sufficiency which takes a systems perspective requiring attention to both demand and supply, as well as the need for flexibility and resilience - looking beyond the short term and immediate site needs.

2.60 Certain plans and strategies already use a whole systems approach (e.g. IWMS and LAEPs), but it should also be applied to digital connectivity. This means for instance, considering how mobile and full-fibre connectivity and resilience deficiencies (particularly not-spots) can be addressed through additional mast and signal- boosting infrastructure on taller buildings and in the public realm; and fibre-optic routing that enables connection through and beyond the site as well as to it.

2.61 It is important that the outcomes of such integrated approaches are embedded into development planning for sites and wider areas from the outset, given they are key to their delivery. This is preferably plan-led through incorporation in local plans, which will require plan-makers to engage with providers and coordinators as well as other information and strategies indicated. Local plans will need to ensure for instance, that adequate space and access is made available for infrastructure upgrades, as well as addressing remaining constraints through phasing and the planning and bringing forward of additional utilities capacity.

2.62 As such, local plans, relevant London Plan specifications (in Box MBUL4 and other cross-referenced policies) and other self-serve information and (in the absence of up to date local plans) strategies signposted will be most important for scheme developers to engage with in preparing their proposals. Such proposals should demonstrate where measures benefit the wider system as well as their immediate site needs. This could be for instance, enhancing the energy system's resilience by addressing building level demand, local generation and load shifting.

2.63 However, where the local plan has not anticipated a particular scale or type of development or where it is of the scale/type indicated in Table 2.3, applicants may also need to undertake engagement with providers and coordinators to inform their proposals and measures such as phasing.

Table 2.3: utilities and expected engagement

Utilities Type	Type, scale or location of development	Engagement required

Electricity	Data centres, referable development, development within grid constrained areas (refer to DMO network capacity plans on websites or LAEPs)[26].	With DNO, National Grid (connection requests greater than 100MW), NESO (Regional Energy Strategic Planner)
Heat networks	Communally heated buildings, waste heat sources (i.e. data centres, energy from facilities, industrial processes, etc), mandatable development within designated heat network zones or elsewhere, development with a heat load of >100MW/yea	Zone Coordination Body[27]
Gas	Development which directly affects a gas installation or legacy gas infrastructure. Development which will connect or support a future hydrogen connection.	Gas Distribution Networks
Water	Referable development, development in known capacity-constrained areas, development with high peak discharge. Development which directly affects water supply infrastructure (excluding normal pipework) Data centres	Statutory Water Undertaker
Wastewater	Referable development, development in known capacity-constrained areas, development with high peak discharge, Development which directly affects sewerage/wastewater infrastructure or is in a [revised] critical drainage area.	Statutory Water Undertaker
Digital connectivity infrastructure	Referable development or that which otherwise affects existing fixed digital connectivity infrastructure which will include schemes over 18m.	Mobile operators by dedicated inbox

2.64 The range of measures highlighted should be considered and incorporated as appropriate to proposals, meeting the technical standards specified. Appropriateness will primarily be established by following the published template relating to particular scales and types of development; and meeting the requirements of detailed policies that are cross-referenced. For the most part, this is likely to be about setting out a clearer audit trail of how utilities considerations have informed design. While for local plans it will be about ensuring at the plan-making stage that plans are clear about where specific utilities infrastructure anticipated through this process (and Policy MBUL1) should be accommodated.

2.65 In areas of little/no existing utilities infrastructure but where growth is planned, measures might include a utilities strategy for that area that brings together utilities planning in an integrated way. This will require pro-active interaction with all the utility providers responsible for the relevant infrastructure systems and as such is preferably part of plan-making activity, but may also be necessary for other large-scale development when this is

[26] While noting pre-application enquiries are always welcome from any development.
[27] Or LPA pending designation of these.

in advance of plan-making.

2.66 In respect of digital infrastructure, it should be noted that provision for continuity of service means there is an expectation that Notices to Quit should not be issued without other arrangements being put in place to ensure service continuity during construction and beyond, in dialogue with affected providers.

2.67 It is also expected that through this process, plan-making bodies establish where the rollout and upgrade of utilities infrastructure has been affected by the difficulty of achieving its compatibility with heritage and other place-based sensitivities. This is known to be a particular issue with digital connectivity infrastructure and many conservation areas for example and is thought to be affecting London's overall mobile connectivity. Where this is the case, plan-makers should engage positively with the relevant industry and together establish suitable expectations and site-based opportunities whereby impacts may be minimised. These should then be set out in local plan policies and site allocations.

2.68 Making data available to inform utilities planning should be done by ensuring the required fields are filled in (and updated as necessary) in the Planning for London Data return, which will in turn be shared with relevant providers and coordinators.

Rationale

This policy reflects a number of key considerations:

2.69 Given the importance of utilities to underpin growth and enable its delivery, it is vital to proactively and strategically plan and design for them across the full range of utility types. A systems approach is needed as part of making best use of land to ensure all opportunities to address system growth needs are taken, ensuring that this happens in a cost-effective and space-efficient manner aligned with wider good growth objectives.

2.70 While this approach is ideally plan-led, (and the Utilities Impact Assessment and this policy is the first stage of that), imperfections in the ability of regulated utilities to engage with growth before it is more certain, and commercial sensitivities in the case of telecoms infrastructure, mean that some aspects are necessarily deferred to the development management process where they are not addressed in local plans.

2.71 Provision of consistent, high-quality planning data to utilities (for example on phasing, demand profiles and efficiency assumptions) at an early stage will help to inform planning and investment decisions. Better upfront alignment reduces late-stage infrastructure redesign, abortive cost and delivery risk.

2.72 The policy also recognises (in line with engagement feedback) that upgrades to London's utilities infrastructure to meet good growth needs have sometimes been constrained by other policy concerns, (notably heritage conservation) rather than a positive way forward being identified and signposted through plans.

2.73 The approach also addresses the unintended consequences of development on utilities infrastructure sufficiency that can occur even when immediate site needs are met. This is a particular issue with digital infrastructure, for instance, where development may result in 'notices to quit' that have eroded London's overall mobile connectivity compared to other equivalent cities.

MBUL5 Sustainable transport to enable London's growth

Policy aim: To enhance additional transport connectivity, manage network capacity and facilitate continued public transport operations.

Applies to: All local plans and all development

Locations: All

Plan-making

A Boroughs should identify (in consultation with TfL and in accordance with Box MBUL5 and Annex D) a set of transport interventions alongside their local plan that:

(1) improves safe, reliable and convenient access by public transport, walking and cycling to increase London's overall housing and economic potential

(2) manages and reduces road traffic to facilitate London's growth and

(3) enables the growth ambitions and complements the strategic transport infrastructure requirements of Policy MBUL1 Spatial strategy and the key diagram.

B Local plans should:

(1) identify within site allocations necessary developer contributions (both financial and physical) to enable the transport interventions identified in Part A

(2) be informed by proportionate evidence of transport challenges and requirements with reference to TfL strategic transport modelling supplemented with local evidence as needed

(3) not include minimum cycle parking standards lower than those in GHR11, maximum car parking standards higher than those in GHR11, or any minimum car parking standards

(4) Identify locations and/or circumstances in which contribution in-lieu of on-site short-stay cycle parking will be sought

(5) following borough consultation with TfL and other relevant transport authorities, identify and safeguard future land requirements, including through site allocations, for:

i. the delivery of the strategic transport infrastructure requirements listed in MBUL1 Spatial Strategy and Annex D Transport interventions

ii. rail, tram, river and bus operations, with regard for additional land needed to increase fleet sizes, expand services and transition to electric buses, with existing facilities only being released where agreed with the relevant transport authority and

iii. other facilities or land related to public transport, walking or cycling.

(6) Enable safe, clean and efficient freight by:

i. identifying how deliveries and servicing will be managed and minimised, using sustainable modes and shared facilities, in site allocations, town centres, the CAZ and BLGs and

ii. protecting the operation, functionality and quality of existing rail and water freight facilities and identifying new rail and water freight facilities, particularly through site allocations.

Development management

C Development proposals should:

(1) Assess, avoid and mitigate impacts on the transport network as required by TfL guidance[28], including through necessary developer contributions to:

i. increase use of walking, cycling and public transport to and from the development

ii. minimise road danger and congestion and

iii. maintain safe walking and cycling access during construction.

(2) ensure provision of cycle parking and minimise car parking in accordance with GHR11

(3) enable safe, efficient and clean freight, deliveries and servicing, and provide operational parking only as far as evidenced and

(4) facilitate sustainable transport operations and improvements, including through the safeguarding of land.

D Facilities for freight, deliveries and servicing should be designed to:

(1) reduce, remode, retime and make safe these operations, including providing safe access and space for cargo bikes and portering and providing consolidation and reception facilities commensurate to the scale and type of development

(2) be safe, efficient and complementary to the public realm by:

i. providing facilities off-street where appropriate given the size, shape and orientation of the site; allow for forward entry and exit; not negatively impact road safety, minimise visual impacts; and make efficient use of land

ii. making use of existing on-street loading facilities where they are: safe; have sufficient capacity; and do not negatively impact existing or planned cycleways or public transport infrastructure or services and

iii. avoiding, unless otherwise agreed with the highway authority, any new loading facilities on the TfL Road Network, on streets with bus routes, or planned or existing cycleways.

(3) for industrial, employment and town centre uses, consider provision for deliveries 24 hours a day, and, for industrial uses, making provision for fully decarbonised fleets.

E Unless otherwise agreed with relevant transport authorities, development proposals should:

(1) provide adequate protection for and suitable mitigation to allow the strategic transport infrastructure requirements as referenced in MBUL1 Spatial Strategy and listed in Annex D to come forward without significant additional cost and

(2) avoid harm to or loss of existing, and safeguard future expansion of: London's cycling

[28] Transport Assessments - Transport for London

and walking networks, cycle parking facilities, and land and buildings used for bus, rail, river and other public transport operations and related support functions. This may require design mitigation.

F The strategic transport infrastructure requirements referred to in MBUL1 Spatial Strategy and key diagram, and listed in Annex D, and other significant public transport infrastructure that would be enabled by development proposals should be given additional weight in decision making where the improvement:

(1) creates significantly wider benefits compared to the scale of development and

(2) is unlikely to be achieved without the development.

G Car-centric uses that make poor use of land, such as drive throughs or low-density retail parks, except for charging stations for electric vehicles, should be refused.

Box MBUL5

1. Public transport, walking and cycling interventions should include:
   - strategic public transport connections (road- and rail-based modes), noting that road-based modes will require priority measures to ensure sufficiently reliable local connections
   - relevant sections of London's strategic cycle network alongside a complementary network of primary and secondary local cycle routes
   - priority locations and routes for creating a safer, more attractive and more inclusive walking environment, particularly in areas of high pedestrian flow or proposed development, with specific interventions relevant for each location listed and
   - both committed and unfunded interventions.

2. Public transport, walking and cycling interventions should be mapped. Maps should identify existing routes or corridors that already meet TfL quality criteria and those that are proposed for improvements, with alignments to specific roads as far as possible. Maps should categorise proposed routes or corridors by both intervention type and delivery priority.

3. Interventions to reduce and manage traffic (within existing road capacity) should be:
   - of a scale to address expected future road network challenges and habitat impacts relating to growth, as assessed through joint working with TfL, with all options in Annex D Table D2 explored;
   - coordinated with the sustainable transport interventions above; and
   - supported by maps showing the order of delivery priorities where possible or otherwise by a broad description of how, when and where they will be used.

4. Information about the above interventions should be submitted alongside local plans. This should be in a suitable format for assessing compliance with part A of this policy and parts 1–3 of this box. It may be in a standalone submission or within documents with a broader purpose (such as an infrastructure delivery plan, local implementation plan, local transport strategy or local plan transport evidence base).

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

2.74 If development proposals are referable to the Mayor, applicants are recommended to engage early with TfL through the pre-application process.[29]

2.75 Mitigation of the impact of developments may include financial contributions (such as funding for bus services) or direct provision of infrastructure (such as additional bus stops or driver facilities). Where development proposals may directly impact existing or future transport, such as bus or rail operations or cycleways, protection and mitigation may include specific building or street design, site layout mitigations, or safeguarding of land.

2.76 Where a scheme in MBUL1 Spatial Strategy and Annex D could potentially be affected by a proposal, applicants should consult with TfL (and other relevant authorities) at an early stage to understand the latest status of the scheme and identify impacts.

2.77 Local car parking standards that are more restrictive than those set out in GHR11 are supported and should be adhered to.

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

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

Rationale

This policy reflects a number of key considerations:

2.79 To meet housing and economic needs and ensure good growth, there is a need to take every opportunity to lift connectivity by sustainable modes, add public transport capacity and enable reliable operations of those services. The deliverability of the 850,000 homes is limited by insufficient transport infrastructure which will need to be addressed through the Plan period.

2.80 Scarce road capacity needs to be carefully managed to prevent congestion becoming a

[29] More information is available at tfl.gov.uk/info-for/urban-planning-and-construction/.

brake on growth. Alongside the support for people to use public transport and to walk and cycle there is a need to restrain car parking in new developments and to resist non-strategic car-centric uses that otherwise would induce more car trips and impact on vital freight and other journeys.

2.81 To achieve this, TfL and boroughs will need to work closely together to maximise the benefit of the city's collective land-use and transport planning powers. Interventions can be tailored to the local context but need to be set within a consistent, coordinated framework to gear London's overall transport network towards facilitating good growth.

2.82 Assessment and mitigation of transport impacts ensures that development helps work towards meeting the Mayor's Transport Strategy aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041. It also ensures that essential transport operations (including the expansion of the network) are effectively facilitated.

2.83 Freight journeys comprise an increasing proportion of traffic on London's roads, particularly light goods vehicles. To support a shift away from road-based freight, development plans and proposals should identify and provide the necessary infrastructure to reduce unnecessary freight journeys, including missed deliveries.

MBUL6 High quality design for a growing, changing city

Policy aim: To ensure that buildings and places maintain quality of life and place into the future and navigate the complexities of a dense urban context through good design.

Applies to: All local plans and all development proposals

Locations: All

Plan-making

A Plan-making authorities should:

(1) promote good design that reflects growth and change needs via the use of design codes and guidance in line with Policy MBUL2

(2) use the latest climate change risk modelling to inform site allocations, spatial policies and design specifications in order to create resilient and adaptive places

(3) plan positively for contrasting uses to co-exist (side-by-side) and for mixed use liveable neighbourhoods through site allocations, spatial and design policies that incorporate appropriate buffering and transition.

Development management

B Development proposals should, as part of the design of the development achieve the following criteria:

(1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness, by identifying the special and valued features and characteristics

of the locality and using these to inform the proposal

(2) form a coherent, legible and accessible pattern of streets and blocks with clearly defined spaces of public and private access, and entrances visible and clearly identifiable from the public realm

(3) be of high-quality architectural design

(4) use high-quality robust materials which relate to the context and are appropriate for all weather conditions, including those anticipated by future climate modelling

(5) maximise active frontages onto the street to engender street-based activity and a sense of safety. Large areas of inactive frontage due to servicing areas/entrances and vents should be avoided

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

(7) design in measures to reduce exposure to the impacts of wider neighbourhood activity, including noise and air pollution and take proportionate measures to minimise the external impact of their own operation and use, in line with the agent of change principle

(8) incorporate high-quality external shading to windows to prevent unnecessary solar gain.

C Infrastructure (both standalone and to meet the needs of the particular development) should:

(1) be designed for multi-functionality and security but also mitigation of [potential] negative impacts on amenity and the surrounding area

(2) incorporate appropriate digital connectivity infrastructure and ducting and other access that enables future ease of connection, maintenance and updating to future technological and risk management standards

(3) be installed through a coordinated 'dig once' approach at construction stage to minimise disruption.

D Development proposals that are referable to the Mayor should have undergone at least one independent design review early on in their preparation before a planning application is submitted. The design review process should be based on the principles set out in the London Design Review Charter, taking account of parts B and C of this policy. Inclusive design review and other specialist design review and advice may be needed. Applicants should show in the design and access statement how they have considered and responded to the design review recommendations.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

2.84 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 their 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. Designing to address air quality concentrations and exposure in line with Policy GHR10 will also be relevant.

2.85 The design of buildings needs to respond to the changing climate. External shading (such as awnings and shutters) is an important design measure to minimise overheating risk and is expected to be incorporated in buildings' design (see Policy GHR4 Heat Risk).

2.86 In the context of London's density, mix of uses and growth pressures, the Agent of Change principle, as set out in national policy and guidance, and policy GLE4, protects existing and permitted activities, which generate noise, light and other impacts, from new sensitive development proposals in their vicinity. These impacts are particularly relevant during their operational hours and also apply along their access routes. Where those existing and permitted activities are expanded, intensified or substantially modified, there are opportunities to reduce their impacts.

2.87 Negative impacts to be anticipated and avoided through infrastructure design, construction and management proposals should be those on public realm functionality and inclusiveness, and wider neighbourhood amenity by way of noise, odour and disruption. Designing infrastructure for security includes ensuring the risk of vandalism and damage by individuals is minimised. Design for multi-benefits may include incorporating green infrastructure, sustainable drainage, play and resting spaces and digital connectivity infrastructure for instance.

2.88 The level of design scrutiny undertaken in a design review will be proportionate to the scale and/or impact of the proposed development. LPAs are encouraged to use design review to support the scrutiny of major development proposals.

2.89 The London Design Review Charter includes guidance on how panels and processes should be managed and records kept. It also clarifies that the purpose of the design review process is not to dictate the design of a scheme or contradict planning policy, but to guide better design outcomes. This process may be supported by specialist advice and processes, including Health Impact Assessments, to draw out considerations set out in national policy whilst ensuring London-specific current and future health risks – many of which will be related to climate and health inequalities – are accounted for.

Rationale

This policy reflects a number of key considerations:

2.90 Good planning and good design are intrinsically linked. Poor quality design can have long lasting implications for people's health, well-being and quality of life. In London, due to its densely built-up form, both above and below ground, and the competing pressures for land, as well as its microclimatic conditions arising from its location and exacerbated by its built form, the impacts of development from future growth require specific design mitigations.

2.91 As part of managing growth and change, future proofing involves consideration of functionality in light of both risks and opportunities in order to support continued quality and functionality as well as other objectives relating to resource efficiency, improving

health and climate change resilience.

2.92 As London grows and intensifies each development should be seen as an opportunity to address different needs in a cost-effective way, alongside its primary purpose, as well as minimising impacts on other uses and users of land through design and operation.

2.93 The form and character of London's buildings and spaces should be appropriate for their location, fit for purpose and respond to changing needs of Londoners and the city overall. This will help to ensure their ongoing success and positive role as London evolves.

2.94 Developments that show a clear understanding of, and relationship with, the distinctive features of a place are more likely to be successful. These features include buildings, open spaces, public realm and the underlying landscape. Development should be designed to respond to and evolve the special characteristics of these features .

2.95 The London Design Review Charter promotes a consistent approach across London's design review sector and promotes transparency of process. The higher the intensity of development, the greater the level of scrutiny there should be on the quality of the proposed development and its interaction with its surroundings, including its 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. Meanwhile, the housing minimum space standards set out in HN8 Housing Design help ensure that as densities increase, quality of internal residential units is also maintained. Development proposals required to undergo design review as set out under Part D of this policy will form a small proportion of overall planning applications in London.

MBUL7 London's heritage

Policy aim: To ensure that new development is responsive to the valued and distinctive heritage features of London, with particular regard to the World Heritage Sites (WHS).

Applies to: All local plans and all development

Locations: All

Plan-making

A LPAs should support and make use of the Greater London Historic Environment Record (GLHER) to identify heritage assets and the contribution they can make to sustainable environment, communities and growth. To help identify heritage assets of archaeological interest, LPAs should develop and maintain up-to-date Archaeological Priority Areas for plan-making and decision-taking purposes. This should include identifying non-designated heritage assets of archaeological interest of national importance to which the policies for designated heritage assets would apply.

B LPAs are encouraged to develop local heritage strategies which capture and harness the benefits of local heritage and its contribution to a diverse cultural offer. Their production should be informed by evidence and involve collaboration between Boroughs, stakeholders and communities.

C LPAs with one of London's four WHS, and those boroughs where development within the setting of a World Heritage Site may affect its significance, should include policies in their Development Plans, which collectively conserve, promote and actively protect the Outstanding Universal Value of WHS (which includes the authenticity and integrity of their attributes as well as their management).

D Up-to-date World Heritage Site Management Plans and Setting Studies should be used to inform the plan-making process. Bodies responsible for World Heritage Site Management Plans should review these frequently and update them when necessary (and at least every 10 years) in order to support plan-making and development-management decisions.

E LPAs are encouraged to bring forward design codes, Local Listed Building Consent Orders and/or LDOs to streamline the planning process where this provides clarity and certainty about appropriate alterations or extension of historic buildings and/or the measures set out in Part G of this policy.

Development management

F Development proposals involving groundworks within an Archaeological Priority Area and all developments over 0.5 hectares should be screened for archaeological interest and where necessary an appropriate level of assessment undertaken to inform decision-making. Heritage assets of archaeological interest should, where appropriate have their significance better revealed through display, interpretation and other forms of public engagement.

G Where the following measures are proposed on heritage assets, they should be supported where such measures achieve an appropriate balance with conserving the significance of the heritage asset:

(1) improvements to the energy-efficiency of a building

(2) decarbonisation of energy sources

(3) installation of renewable microgeneration

(4) measures to minimise overheating.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

2.96 This policy builds on the framework of heritage policies at national level which should be appropriately applied in the London context, including providing a Heritage Impact Assessment where required. Particular regard should be given to London's WHS.

2.97 The GLHER includes over 223,000 records relating to heritage assets and the wider historic environment. The GLHER is used to assess archaeological potential. 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 (see Figure 2.9). The Greater London Archaeological Advisory Service publishes guidance on best practice for archaeological investigations affecting the capital's diverse range of sites and assets of archaeological interest, and securing the public benefit arising from their conservation and investigation.

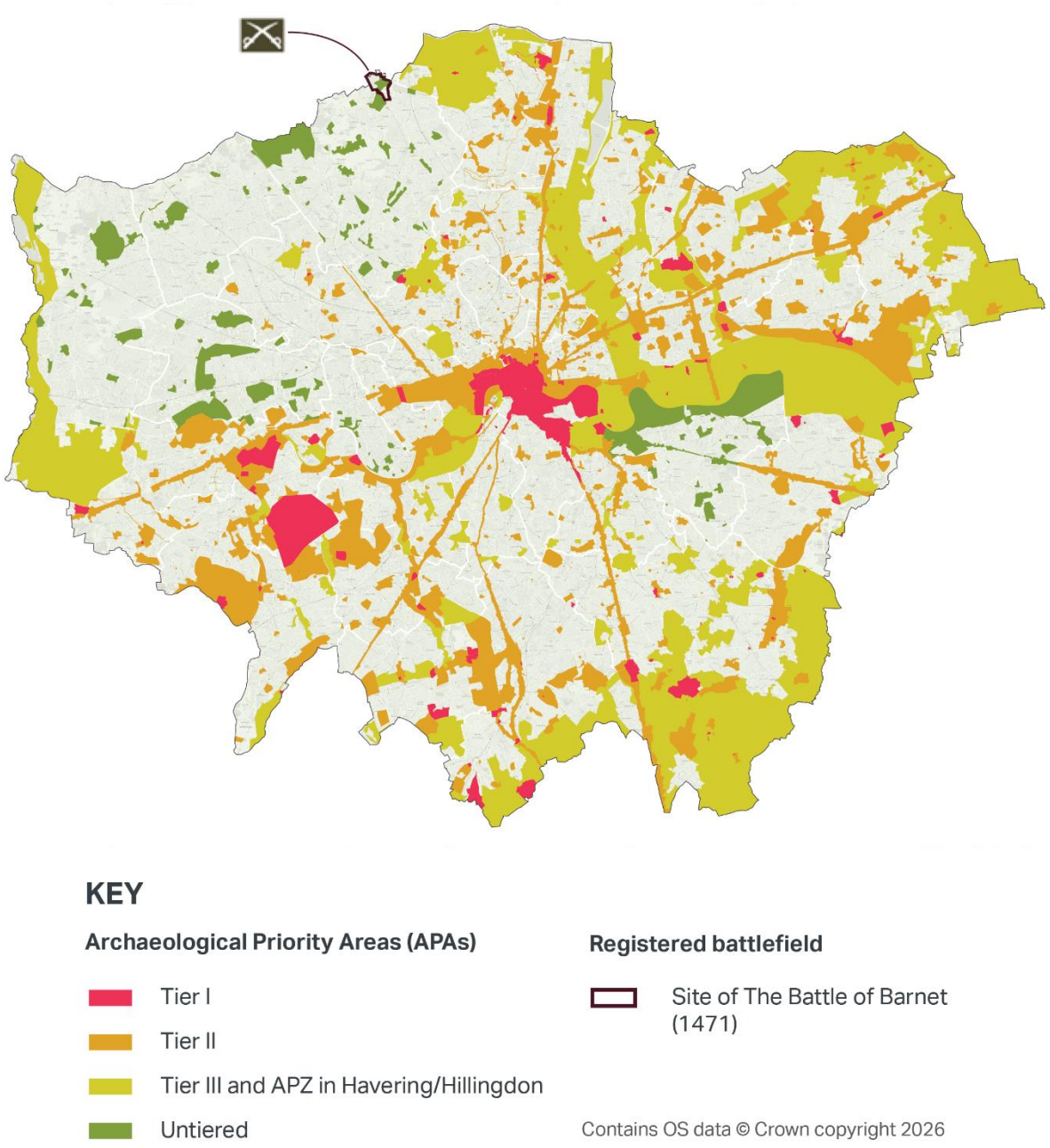
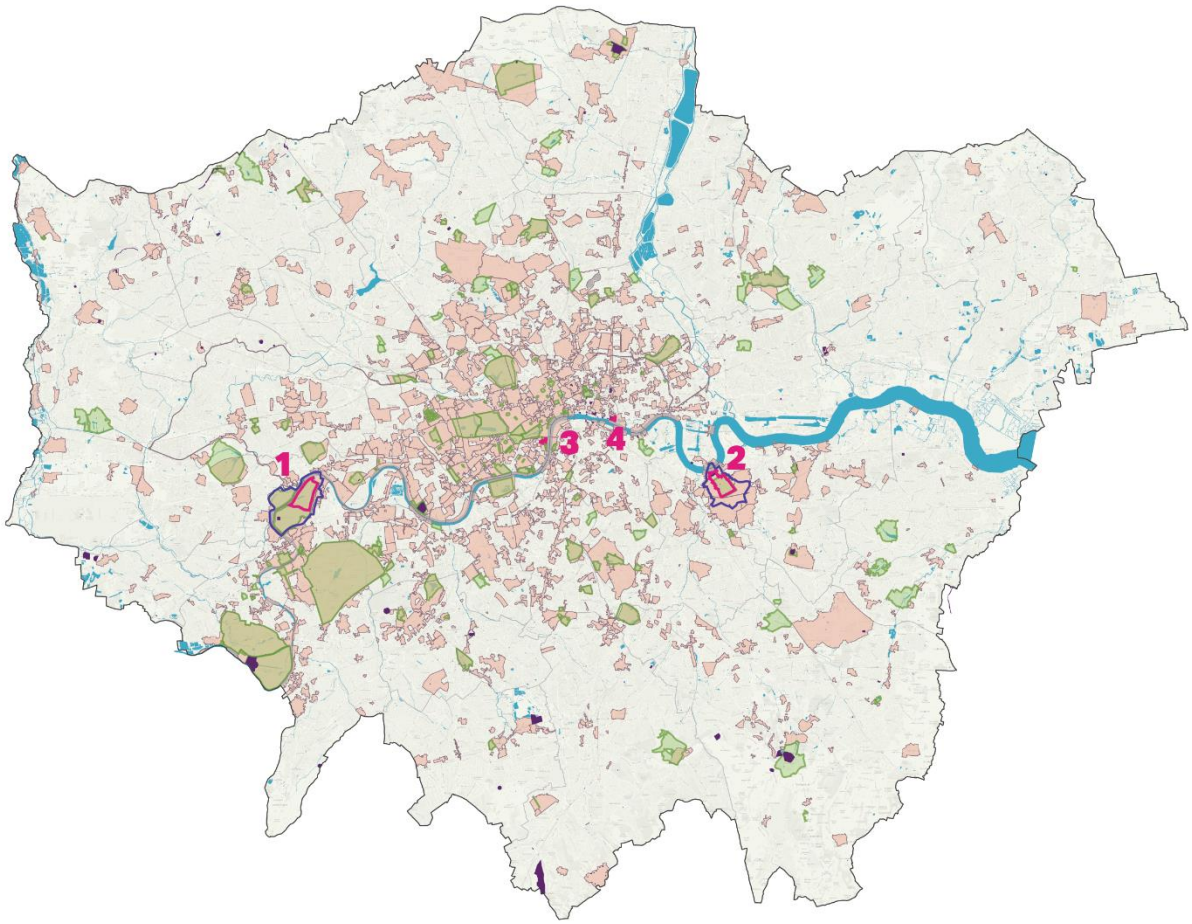


Figure 2.9 Archaeological Priority Areas and Registered Battlefields

2.98 There are 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 assets that are on the At Risk Register. In particular, local heritage strategies can be used to identify opportunities for positive change, with tangible actions and priorities. Topics they can address include the identification of and approaches to: local character and distinctiveness, town centres and high streets, aspirations for key development sites, public buildings and spaces, designated and non-designated heritage assets, conservation area appraisals and management plans, archaeology, heritage at risk, local lists, museums and archives, intangible heritage, funding sources and marketing.

Figure 2.10: London-wide heritage map



KEY

- World Heritage Sites
- World Heritage Site buffer zone
- 1 Royal Botanic Gardens, Kew
- 2 Maritime Greenwich
- 3 Palace of Westminster & Westminster Abbey
- 4 Tower of London
- Registered Historic Parks & Gardens
- Waterways
- Conservation Areas
- Scheduled Monuments

2.99 The setting of London's WHS 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. The fundamental contribution made by the setting of London's WHS, including any buffer zone, to their Outstanding Universal Value and the ability to appreciate it should be set out in each of the site's WHS Management Plan and/or Setting Studies. As all four of London's WHS are located along the River Thames, the setting of these sites includes the adjacent riverscape as well as the surrounding cityscape. Changes to the setting can have an adverse, neutral or beneficial impact on the

sites' Outstanding Universal Value and the ability to appreciate it.

2.100 The consideration of views is part of understanding potential impacts on the Outstanding Universal Value of the WHS from change within their settings. Many views to and from WHS are covered, in part, by the London Views Management Framework. However, consideration of the attributes that convey their Outstanding Universal Value is likely to require other additional views to be considered. These key views should be identified in World Heritage Site Management Plans and supported wherever possible by the use of accurate 3D digital modelling and other best practice techniques.

2.101 Part C of this policy is to be applied where impacts, including but not limited to visual impacts, from developments could occur. It is expected that relevant boroughs'[30] local plans should contain such necessary policies to protect the Outstanding Universal Value of WHS. The Mayor will support steering groups in managing the WHS and will actively engage with stakeholders in the development and implementation of WHS Management Plans. It is expected that the boroughs with WHS, 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.

2.102 In exploring energy-efficiency, decarbonisation, renewable microgeneration and measures to minimise overheating (including external shading), applicants are encouraged to consider the full range of measures that can be incorporated as part of the planning application. This includes improvements that can be made to the significance of heritage assets by reinstating original features when carrying out these improvements. Applicants and local authorities are encouraged to use the latest Historic England guidance.

Rationale

This policy reflects a number of key considerations:

2.103 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. London's diverse range of designated and non-designated heritage assets contributes to its status as a world-class city. It is therefore appropriate for this Plan to include a strategic approach to heritage assets.

2.104 Designated assets currently include four WHS, over 1,000 conservation areas, 19,000 list entries for historic buildings, 150 registered parks and gardens, 160 scheduled monuments, and one battlefield. Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows, ancient woodlands, and ancient and veteran trees. Given the number of heritage assets in London they play an important role in climate change mitigation and adaptation.

2.105 Having wide-ranging and inclusive conversations with Londoners should ensure that heritage strategies are informed by a robust understanding of what people value about their local places and how communities and partner organisations can be involved.

2.106 The UNESCO WHS at Maritime Greenwich, Royal Botanic Gardens (Kew), the Palace of

[30] With reference to figure 2.10

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. The qualities of each are conditioned by the character and form of its surroundings as well as other cultural, intellectual, spatial or functional relationships.

2.107 This policy applies not just to the World Heritage Site, but also the surrounding environment. This is to ensure that the attributes of the WHS that convey their Outstanding Universal Value are protected and enhanced, while allowing the surrounding area to change and evolve as it has for centuries.

MBUL8 Inclusive design

Policy aim: To ensure that development contributes towards an inclusive built environment enabling all Londoners to participate in their city.

Applies to: All

Locations: All

Plan-making

A Plan-making authorities should ensure their local plans, area strategies, masterplans and design codes contribute to creating an inclusive built environment.

Development management

B Development proposals should contribute to an inclusive built environment, achieving the following criteria:

(1) Designed to respond to and accommodate the requirements of London's diverse population and be flexible to accommodate future requirements.

(2) Are convenient and welcoming with no disabling barriers, providing independent and safe access and egress without additional undue effort or separation.

(3) In all new buildings of any height where lifts are installed, as a minimum at least one lift per core that includes a lift should be a fire evacuation lift suitable to be used to evacuate people who require level access from the building.

C Where a design and access statement is submitted with a planning application it should include a section that demonstrates how the requirements of part B have been met by:

(1) explaining the design concept and identifying the features that have been included to respond to different end users' requirements set out in part B, and how they will be maintained

(2) detail what best practice standards and design guidance documents have been applied which are relevant to/or contribute towards to the creation of an inclusive built environment

(3) detail any engagement with relevant end user/ protected characteristic groups,

including design review and/or access and inclusion panel feedback, which informed the relevant design decisions

(4) where relevant, provide details of the evacuation lift(s) and shaft, and protected lobbies; the evacuation lift capacity assessment; the evacuation strategy, and the evacuation lift(s) management plan.

D The Mayor will actively monitor changes in national requirements for evacuation lifts and will publish a formal statement of supercession when parts B(3) and C(4) are no longer deemed necessary

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

2.108 Where lifts are proposed in a new building to enable level access to different floors of the buildings, the policy requires that an evacuation lift is provided to allow people who require level access to evacuate from the building safely and with dignity when above or below the entrance level. The fire evacuation lift(s), and associated provisions are expected to be appropriately designed, constructed and include the necessary controls suitable for the purposes intended. The requirement for evacuation lift(s) applies to a core in which the development proposal includes a lift. Where a core is proposed with only a stairway and no lift, no evacuation lift is required to meet this policy requirement. For the purpose of this policy new buildings include substantial redevelopment of existing buildings (requiring planning permission).

2.109 The detail and extent of the information provided to meet the requirements of Part B will be proportionate to the scale and type of development, and will include details of any specialist advice and/or design review feedback and outcomes (see also MBUL6 High quality design for a growing, changing city for design scrutiny requirements)

Rationale

This policy reflects a number of key considerations:

2.110 London is a diverse city and it is important that all Londoners are able to access and enjoy the homes, places and opportunities it offers and feel welcome in its public spaces.

2.111 London is home to more than a million people with disabilities and it contains around 70 per cent of the UK's high-rise buildings and four times the national average of high-rise homes. The policy requires that that people who require level access can access all areas of a development in an inclusive way, and in terms of vertical circulation, this is often achieved via the provision of lifts.

2.112 All building users should be able to evacuate from a building with dignity and by as independent means as possible. Emergency carry down or carry up mechanical devices or similar interventions that rely on manual handling are not considered to be appropriate, for reasons of user dignity and independence.

2.113 At the current time there is no equivalent requirement to this policy for evacuation lifts in the Building Regulation as set out in this policy. If such a requirement was introduced in the future it would remove the need for this particular part of the policy and the Mayor will make this fact clear in a formal statement.

2.114 It is important to consider the development's contribution to the creation of an inclusive built environment at the earliest possible stage in the development process – from initial conception through to completion and, where relevant, the occupation and on-going management and maintenance of the development.

MBUL9 Healthy streets and public realm

Policy aim: To deliver streets and public realm that are welcoming, accessible and safe.

Applies to: Major development, development with new or redeveloped public realm, and any development that impacts the public realm, including in terms of increased trips, altered access, increased impermeability, or increased demand on public realm.

Locations: All locations with publicly accessible streets and spaces outside and within buildings.

Development management

A Public realm should be welcoming, be well-designed through a Healthy Streets Approach and feel safe, during day and night, in line with the ambitions of the Mayor's ending Violence against Women and Girls (VAWG) Strategy.

B To be in line with the Healthy Streets Approach development should provide, facilitate, or contribute towards:

(1) high-quality walking and cycling connections including to nearby bus stops and stations, wider walking and cycling routes and other trip attractors as identified by TfL or boroughs, through transport assessments or in Annex D Table D2

(2) step free routes with clear wayfinding, suitable clear widths and crossing points that meet desire lines

(3) seating, trees and other forms of shade and shelter

(4) minimising clutter on footways, including from advertisements, and by creating dedicated spaces for dockless cycles and scooters

(5) reducing road danger and vehicle dominance created by moving and parked vehicles, avoiding vehicle crossovers, limiting or preventing through traffic

(6) sustainable deliveries and servicing in line with policy MBUL5 to minimise kerbside conflicts and prioritise public realm for people

(7) minimising impermeability and improving sustainable drainage and biodiverse planting

(8) school streets, play streets and other temporary or permanent use of streets as social spaces.

C Proposals for new, improved, or redeveloped public realm should also be designed to:

(1) provide clear sightlines, avoid creating isolated areas and have active uses along the public realm

(2) have well designed lighting, avoiding glare and light pollution, including from

advertisements

(3) create spaces for multiple users and activities by providing a variety of free to use seating

(4) ensure free and well-maintained toilets and drinking water fountains for public use are available within the vicinity or are co-located with other facilities in the public realm.

D Major developments should do the following:

(1) Maximise opportunities to create new and improved public realm, prioritising public realm that is directly accessible from street level. In high density areas, such as the CAZ and town centres, public realm provision at various levels may be considered suitable if demonstrated that it cannot be provided at street level.

(2) Create temporary public realm in locations which will be developed at a later stage.

(3) Create new public realm in early phases of the development.

(4) Involve local communities, including women and girls, to inform the design of public spaces.

(5) manage and maintain the public realm in line with the Public London Charter.

E Development proposals affecting the public realm should assess and mitigate impacts (including during construction) through proportionate improvements or contributions to achieve the outcomes in Parts A, B, and C, as well as inclusive design principles in line with Policy MBUL8.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

2.115 The public realm should be seen as a series of connected spaces that facilitate safe and inclusive social interaction, leisure, play, and movement. The specific balance between the different functions of any one space, its local context, including socio-demographic and heritage, should be at the heart of how the space is designed and managed.

2.116 Transport for London has guidance and toolkits on the Healthy Streets Approach, as well as wider streets planning and design guidance[31] and the Department for Transport's Inclusive Mobility and TfL's pedestrian comfort guidance set out recommended minimum footway widths which may be useful in assessing footway clutter.

2.117 The Mayor's Good Growth by Design programme has guidance including Making London Child-Friendly, Expanding London's Public Realm, Safety in Public Space and Designing with Disabled Experience. GLA Public Art Commissioning guidance sets out best practice commissioning processes for public art. Mayor's guidance on Safety in Public Space: Women, Girls and Gender Diverse People provides tools for design and engagement.

2.118 Developments that provide significant new public realm are not expected to provide public toilets and drinking water fountains so long as there are agreements in place,

[31] tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets

visibly displayed, for free use of toilets and water fountains within walking distance.

Rationale

This policy reflects a number of key considerations:

2.119 The quality of the public realm has a significant influence on people's quality of life, including their health.

2.120 About 80 per cent of public realm in London is in the form of streets and it is important that every development contributes towards their improvement to provide cumulative social and environmental benefit in line with Healthy Streets Approach. The Approach addresses London's inactivity crisis, improves air quality and reduces other health impacts by planning street networks that work well for people walking or cycling. It also ensures that streets become social spaces.

2.121 The policy focuses on safety for all people during day and night, but at the same time acknowledges that the design of public realm can in particular affect the real and perceived safety of women and girls and gender diverse people and can discourage them from using the public realm and public transport. The role of the built environment in preventing Violence Against Women and Girls is clear and opportunities to tackle it must be reflected in plan-making, development proposals and planning decisions.

2.122 Access to public toilets and drinking water fountains are essential for people to be able to stay and socialise in the public realm.

MBUL10 Security and safety

Policy aim: To ensure that buildings and places are designed for security, safety and resilience and reflect the particular context of London

Applies to: All local plans and all development

Locations: All

Plan-making

A Plan-making authorities should:

(1) work with Metropolitan Police Service, Counter Terrorism Security Advisors, and with agencies including the London Fire Commissioner, the City of London Police, the British Transport Police, and the Ministry of Justice, to identify community safety needs and the sites and policies required for their area to support provision of necessary infrastructure to maintain a safe and secure environment

(2) refer to Health and Safety Executive mapping of hazard zones, having regard to implications for the nature and design of development, unless engagement with the relevant infrastructure provider indicates a route to their removal.

Development management

B Development proposals should consider and, as appropriate, incorporate design measures to address:

(1) safety and security measures, including for women and girls and other vulnerable groups

(2) counter terrorism measures. These measures should be proportionate to threat and consequence and be inclusive, well integrated with buildings and the public realm, and should not shift vulnerabilities elsewhere.

C Major developments of any height providing residential accommodation and/or uses included within purpose groups 1 and 2 buildings as set out in the government's Approved Document B, should meet the highest standards of fire safety by being designed to:

(1) reduce the risk to life and the risk of serious injury in the event of a fire

(2) minimise the risk of fire spread and not incorporate combustible materials in their external wall

(3) A competent fire engineer should confirm in the design and access statement that the proposed development meets the requirements of parts C(1) and (2)

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

2.123 By considering security at the start of the design process new developments, including streets and public spaces, can address policy criteria when it is most cost effective to do so, and incorporate elements to deter and disrupt hostile activity, assist detection and help mitigate effects without compromising good design.

2.124 Planning officers are not experts in fire safety. Therefore the onus is on the applicant for the development, through the use of fire safety professionals, to demonstrate compliance with Part C of this policy. The role of planning officer is to ensure information which demonstrates compliance with part C has been provided.

2.125 A competent fire engineer is one that is registered with the Engineering Council as an Incorporated Engineer (IEng) or Chartered Engineer (CEng), and a member of the Institution of Fire Engineers or other (fire relevant) professional engineering institution. Further details can be found on the Institution of Fire Engineers website (https://www.ife.org.uk/)

2.126 The Mayor will actively monitor changes in national fire safety requirements and will publish a formal statement of supersession when part E of this policy is no longer deemed necessary.

Rationale

This policy reflects a number of key considerations:

2.127 The safety of residents and those working in and visiting London is an issue of strategic importance and ensuring a safe and resilient city is a key concern when planning for new development.

2.128 While the matter of fire safety compliance is covered by Part B of the Building Regulations, the Mayor currently has some concerns around the scope and standards of these Regulations in particular with regard to fire safety in residential accommodation. London's uniquely dense built environment, which includes the majority of the country's tall buildings, makes it particularly susceptible to fire safety risks.

2.129 The restriction on using combustible materials in external walls is to support public confidence in the quality of residential accommodation, in the context of London's dense urban environment and disasters such as the tragic Grenfell Tower fire by applying the precautionary approach to buildings that provide sleeping accommodation. It also helps ensure the highest standards of fire safety for residential accommodation.

3 Delivering the homes and neighbourhoods Londoners need

Reasoned justification for chapter 3

3.1 London faces an unprecedented challenge to deliver not only a significant number of new homes, but accommodation that is affordable and of varying types and tenures that can meet the broad needs of Londoners. Not only is diversification of supply a key part of meeting needs, it is also an important factor in supporting London's available sites to delivery, particularly in the context of difficult and uncertain economic conditions.

3.2 The London Plan is planning for 558,000 new homes between 2027 and 2036, with a goal of meeting the housing need figure set by the government of 850,000 homes as soon as possible in the following ten-year period. The Plan sets 10-year capacity-derived housing targets for London's local planning authorities. These targets take the most ambitious approach possible in the context of land and environmental constraints, and deliverability limitations in the shorter term (as set out in chapter 1). They reflect the commitment to making the most of brownfield opportunities and ensuring that these opportunities have been maximised, but do also require the use of Green Belt land (set out as separate components).

3.3 Delivering new homes is not just about achieving numbers. It is essential that London ensures choice, providing homes in the right locations and of the right size, tenure and type. The homes that are delivered also need to be good quality, and well-designed to provide appropriate levels of amenity.

3.4 Affordable housing is essential not just to ensure an inclusive city and healthy thriving communities, but also for London's growth and productivity, as expensive housing limits individuals' mobility and ability to access jobs. Affordability pressures must be addressed through social rent and intermediate tenure delivery and important Key Workers' needs must be considered as part of retaining London's economic and social vibrance.

3.5 There are inevitable limitations in the pace and scale of the build-out and delivery of market homes - arising from a vulnerability to changes in demand from potential buyers – and providing higher levels of affordable housing also plays a vital role in supporting delivery, as does increasing the growing role of Build to Rent in London's housing market. Both types of home serve not only to meet identified needs, but act to diversify sites and so reduce their overall exposure to 'market absorption' from buyer demand, which might otherwise slow down delivery.

3.6 Meeting the needs of London's diverse communities, be that Gypsies and Travellers, older people, students or those that require supported or accessible homes is also key to ensuring a truly successful and thriving city. These housing policies are designed to recognise and detail how local authorities and applicants should seek to address varying accommodation needs by supporting delivery of new homes and also protecting and managing existing housing stock where necessary.

3.7 The evidence is clear that affordable housing need in London is high. While the 2026 Strategic Housing Market Assessment (SHMA) shows that different levels of housing delivery over time result in different levels of affordable housing need (due to different

household formation scenarios), that need still remains high. Delivering at a rate of circa 56,000 homes a year would mean that London's affordable housing need is 60 percent of overall supply.

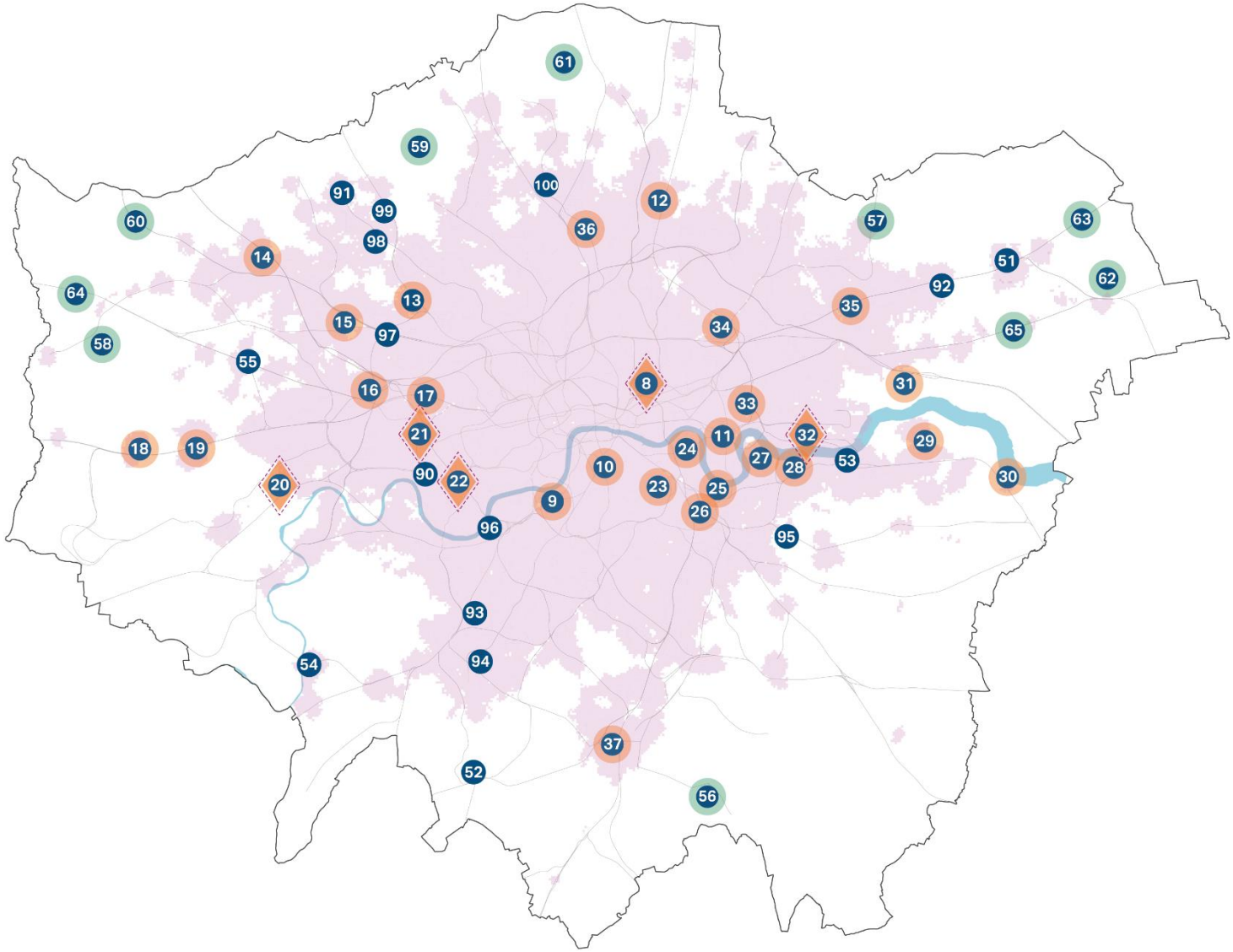
3.8 Given that future delivery rates (which impact precise levels of need) cannot be known, the Mayor remains committed to a strategic target for London of 50 per cent of homes to be genuinely affordable over the longer-term plan period.

3.9 To help support affordable housing delivery, the Threshold Approach to Planning Applications is designed to incentivise development to come forward and to secure affordable housing as part of this. The approach in this Plan maintains this key principle and mechanism, but is also cognisant of viability challenges, reflecting what can be achieved in different parts of the city, on different types of land given variations in development values and costs. Where affordable housing thresholds are met this avoids the requirement to provide detailed viability information and is designed to continue to embed affordable housing expectations into land values, deliver certainty to market, and to speed up the planning process by reducing protracted viability discussions, in turn delivering the homes that Londoners need.

3.10 The Burial Space policy in turn sets out to ensure sufficiency of a form of social infrastructure that is important to many people as part of their faith and/or the natural life course. This is a form of infrastructure that is necessarily planned for on a cross-boundary basis reflecting the uneven distribution of capacity and differential opportunity for the formats required.

3.11 The sub-key diagram illustrates the Homes and Neighbourhoods policies spatially where relevant, but should be read in conjunction with the key diagrams in chapter 1 and the Places sub-key diagram in chapter 6.

Figure 3.1: Homes and Neighbourhoods sub key diagram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KEY

Sustainable Access Measure Levels 4 and above

BLG: Brownfield First Opportunity Areas (BFOAs)

8 City Fringe/Tech City*
9 Vauxhall, Nine Elms and Battersea
10 Elephant and Castle
11 Isle of Dogs and South Poplar
12 Lee Valley
13 Brent Cross/Cricklewood/ Staples Corner
14 Harrow and Wealdstone
15 Wembley
16 Old Oak/Park Royal
17 Kensal Canalside
18 Hayes
19 Southhall
20 Great West Corridor*
21 White City* Earl's Court/West
22 Kensington*
23 Old Kent Road
24 Canada Water Deptford Creek/
25 Greenwich Riverside New Cross - Lewisham -
26 Catford
27 Greenwich Peninsula
28 Charlton Riverside
29 Thamesmead and Abbey Wood
30 Bexley Riverside
31 London Riverside
32 Royal Docks and Beckton Riverside*
33 Poplar Riverside
34 Olympic Legacy
35 Ilford
36 Wood Green
37 Croydon

**BFOA's marked with an asterisk are also strategic economic clusters.*

BLG: Brownfield Town Centre and Other

51 Romford
52 Kingston
53 Sutton
54 Woolwich
55 Greenford
90 Hammersmith
91 Edgware
92 Chadwell Heath
93 North Wimbledon
94 South Wimbledon
95 Kidbrooke
96 York Road
97 Dollis Hill
98 Colindale
99 Grahame Park
100 Arnos Grove

BLG: Green Belt Residential-led Mixed Use

56 Croydon-New Addington
57 Eastern Hainhault Loop
58 East of Ickenham
59 Mill Hill and Barnet
60 Northwood
61 Crews Hill and Chase Park
62 Upminster
63 Harold Park
64 West Rusilip

HN1 Increasing London's housing stock

Policy aim: To deliver homes that contribute towards meeting London's housing need.

Applies to: All local plans

Locations: All

Plan-making

A Plan-making authorities through their local plans should, in line with policy MBUL1 Spatial Strategy:

(1) adopt and plan for the individual ten-year housing targets set out in Table 3.1; and

(2) positively plan for additional longer-term capacity of at least 850k up to 2047.

Table 3.1: Housing targets for Local Planning Authorities from 2027/28 to 2036/37

Local Planning Authority	Brownfield housing target	Greenfield housing target	Total housing target
Barking and Dagenham	8,558	1,140	9,698
Barnet	25,730	7,000	32,730
Bexley	6,217	-	6,217
Brent	25,316	-	25,316
Bromley	7,507	-	7,507
Camden	12,085	-	12,085
City of London	1,716	-	1,716
Croydon	15,944	5,600	21,544
Ealing	32,054	-	32,054
Enfield	14,062	7,000	21,062
Greenwich	27,850	-	27,850
Hackney	10,584	-	10,584
Hammersmith and Fulham	16,784	-	16,784
Haringey	19,030	-	19,030
Harrow	8,860	3,150	12,010

Havering	9,652	12,060	21,712
Hillingdon	9,280	14,750	24,030
Hounslow	17,975	-	17,975
Islington	6,768	-	6,768
Kensington and Chelsea	5,904	-	5,904
Kingston upon Thames	6,872	-	6,872
Lambeth	16,370	-	16,370
Lewisham	14,052	-	14,052
Merton	14,272	-	14,272
Newham	26,260	-	26,260
OPDC	11,335	-	11,335
Redbridge	10,730	5,400	16,130
Richmond upon Thames	5,397	-	5,397
Southwark	27,799	-	27,799
Sutton	4,781	-	4,781
Tower Hamlets	24,704	-	24,704
Waltham Forest	19,070	-	19,070
Wandsworth	26,609	-	26,609
Westminster	12,224	-	12,224
London Total	502,351	56,100	558,451

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.12 LPA housing targets may be planned for at the local level through either a stepped housing trajectory that varies requirements over the 10 years, or through equal division of the target on an annual basis. Housing targets are to be monitored by determining net supply.

3.13 Reflecting the lead-in times for delivery in Green Belt locations, the housing requirement for LPAs that have a greenfield component to their target will be set at the annualised equivalent of the brownfield target only for years 2027/28 to 2029/30. Typically, housing delivery on brownfield land across London should be prioritised over greenfield

development in accordance with MBUL1 Spatial Strategy. Where LPAs have a greenfield component to their housing target they should plan for strategic growth to deliver against this assessed capacity. These should be advanced through Green Belt release in line with PV7 - Sustainable development and enhancement of the Green Belt. Any under delivery against brownfield targets should not be off-set at the local level by planning for increased delivery on greenfield land, particularly where this would involve land outside of identified BLGs.

3.14 Given that housing requirements are strongly tied to the viability context in most locations across London, targets are considered to be set at the minimum level and higher numbers are expected to be positively planned for (including in relation to capacity to achieve 850,000 homes) to enable delivery as viability conditions improve and over the longer term. The GLA will work with LPAs through its General Conformity process, to seek to embed the implementation of the Plan's approaches optimise density and maximise to ensure that growth is positively planned for.

3.15 The housing targets in Table 3.1 are capacity based, with the evidence supporting the London Plan demonstrating the extent to which the identified housing needs of London can be accommodated (see the GLA's Strategic Housing Land Availability Assessment (2026) (SHLAA)). As such, when LPAs propose housing requirements in local plans, these should account for all of the identified capacity from the base date of the SHLAA 2026. This means planning to meet any shortfall from under-delivery over the elapsed part of Table 3.1s 10-year period as early as possible so as not to unnecessarily delay meeting identified development needs.

3.16 LPAs are encouraged to use the Land4LDN platform to prepare this evidence and will be expected to demonstrate clear evidence that the identified capacity cannot be delivered sooner, with no available supply able to be brought forward from later in the plan period.

3.17 Any further sustainable locations or additional greenfield capacity identified above the figures in the brownfield target should be considered additional to the overall housing target in order to protect the Plan's brownfield first approach.

3.18 Student housing need is a component general housing need and as such, the ten-year targets for PBSA set out in Table 3.6 of policy HN5 Managing specialist accommodation, are a component of the local planning authority targets in Table 3.1. As non-self-contained accommodation (NSC), PBSA will count towards meeting LPA housing targets on a 2.5:1 ratio, with two and a half bedspaces/units being counted as a single home.

3.19 NSC for older people should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom counted as a single home.

3.20 All other NSC communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home.

Rationale

This policy reflects a number of key considerations:

3.21 It is recognised that London has a very high need for housing of multiple types and tenures. However, the ability to deliver new homes is not simply linked to land availability, infrastructure capacity or environmental factors, but is constrained by

viability, which is impacted by a wider macro-economic context that changes over time. As such, the SHLAA has taken this into account and derived a housing requirement for London and its constituent LPAs that incorporates assumptions around the potential achievability of representative types of development over the target-setting period.

3.22 The housing targets in Table 3.1 are reflective of the expected delivery associated with following the spatial strategy set out in MBUL1. The contribution which can be made from various brownfield and greenfield sources has been estimated through the SHLAA 2026, and reflects a level of development which meets housing need as far as possible. The Plan follows a brownfield first approach, bringing in greenfield development in a targeted manner to ensure that new development is in sustainable locations, is well connected and can be viably serviced.

3.23 Although it is typical for Mayoral Development Corporations (MDCs) where they are also the plan-making authority to have their own housing target, this is not the case for Oxford Street MDC – an area that contains limited capacity for new homes. This approach will ensure flexibility in delivery can be maintained across the wider borough.

3.24 In terms of the different ratios used to count NSC against the overarching housing target, this is based on the amount of self-contained housing this form of supply could free up on delivery.

HN2 Protecting and reshaping housing

Policy aim: To ensure homes that meet Londoners' needs are protected or that the appropriate steps are taken to secure re-provision and to deliver overall benefits.

Applies to: All self-contained housing and non-self-contained accommodation

Locations: All

Development management

A Development proposals for the loss of self-contained housing should be resisted, unless:

(1) replaced with at least the existing overall floorspace and, wherever possible, uplifting existing densities, in line with MBUL2 Optimising the use of land and site capacity, and

(2) in the case of social rent homes, providing replacement floorspace within that tenure, regardless of whether the replacement home facilitates a right to return or remain, or

(3) in the case of other low-cost rent and intermediate homes, providing replacement floorspace within that specific tenure or one that is more affordable as defined by the criteria in HN3 Delivering affordable housing.

B Development proposals for the loss of non-self-contained accommodation should ensure adequate replacement where it meets a need identified through strategic or local evidence, unless assessed and identified as surplus as part of a broader strategic approach.

C Development proposals for the demolition and replacement of affordable homes should:

(1) provide a robust assessment of the benefits and disbenefits of alternative options to this approach in the first instance

(2) weigh up the potential benefits of demolition and replacement against wider social and environmental impacts, and

(3) maximise the provision of additional affordable housing. These may follow the fast-track route where 50 per cent of the additional housing in the scheme is affordable and provided in line with the tenure and affordability requirements set out in HN3 Delivering Affordable Housing.

D Development proposals for modular temporary accommodation as a meanwhile use should be supported where possible.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.25 This policy applies to the loss of specialist and supported housing (SSH) accommodation (ref policy) as well as more conventional housing. Although SSH is more likely to be classed as non-self-contained accommodation, some schemes depending on their individual format or circumstances may be self-contained homes.

3.26 Where evidence produced by the Mayor or the local planning authority indicates either a broader strategic need or a need within borough for such accommodation, its loss is not considered to be justified unless it can be demonstrated that need will still be met, for example through consolidation plans (as part of a wider estates planning exercise) or via absorption by alternative provision, without resulting in a strain on existing resources.

3.27 Policy criteria on the loss of affordable housing apply in all cases, including proposals for Estate Regeneration undertaken by boroughs, housing associations and their partners. Estate Regeneration schemes are expected to take into account the Mayor's Good Practice Guide to Estate Regeneration particularly in relation to considering alternatives to demolition and engaging with residents, including the use of ballots. To secure Mayoral funding, strategic schemes involving demolition of affordable homes will be required (unless exempt) to demonstrate residents' support via a vote in favour of plans.

3.28 It is expected that existing affordable housing floorspace is re-provided and that additional affordable housing delivery is maximised in estate regeneration schemes. For schemes that meet the criteria in A, and that provide 50 per cent of the additional residential accommodation as affordable housing, viability testing will not be required, and the scheme will be able to follow the fast-track route. Affordable housing that is reprovided as part of redevelopment should be measured by floorspace. Any net additional provision should be measured by habitable room, unless there are demonstrable reasons why measurement by floorspace is more appropriate.

3.29 Where estate redevelopment is taking place as part of a wider programme, it may be acceptable for affordable housing reprovision on individual estates to vary (taking account of the wishes of people who want to return to the estate), if the overall level of provision and tenure is maintained across the programme in accordance with A(1) and A(2), and where the approach is acceptable to the borough and, where relevant, the Mayor.

Rationale

This policy reflects a number of key considerations:

3.30 Meeting London's housing need is not simply about building new homes, it is also about retaining or managing the loss of existing stock where there is a clear rationale for doing so. In the case of self-contained housing, where needs are high for both market and affordable homes, it is not acceptable for loss to occur unless replaced with increased floorspace provision and/ or tenures that are at least as affordable.

3.31 The need for different types of non-self-contained homes is more sensitive to fluctuations over time than that of conventional housing, and requires a more flexible approach. This need tends to be more localised and impacted by factors such as funding streams available and changes in national policy. As such, in the case of redevelopment, it is necessary to require evidence that any loss of capacity can be absorbed by other provision or that a need no longer exists in that location.

3.32 The Mayor remains committed, in the case of proposals to demolish affordable housing including estate regeneration schemes, that due consideration is given to alternative approaches and that benefits are clearly demonstrated.

3.33 In the case of redevelopment of affordable housing, the requirement that any reprovision be measured by floorspace versus any new provision by habitable room, is designed to

account for that fact that existing homes may not meet space standards. Floorspace reprovision would therefore be a sufficient measure to meet policy requirements.

3.34 In terms of temporary accommodation as a meanwhile use, the plan recognises that modular housing may play a role in optimising underutilised land in the short-term, whilst address urgent local housing need.

HN3 Delivering affordable housing

Policy aim: To deliver affordable housing to contribute to meeting London's need as set out in London's SHMA.

Applies to: Proposals for homes of 10 units or above

Locations: All

Plan-making

A Plan-making authorities should:

(1) maximise the delivery of genuinely affordable housing to contribute to London's 50 per cent strategic affordable housing target

(2) seek to collectively deliver 219,940 low-cost rent and 119,940 as intermediate homes by 2037 reflecting the extent of need

(3) follow the Threshold Approach to Planning Applications as set out in the development management section of this policy for referable and non-referable planning applications

(4) draw up and publish allocations policies and maintain housing registers for intermediate homes, alongside any other measures considered necessary to ensure fair and transparent allocation for intermediate homes; and

(5) give priority access to intermediate homes to key workers.

Development management

B Development proposals should maximise the delivery of genuinely affordable housing to:

(1) contribute to London's Strategic target of achieving 50 per cent affordable housing; and

(2) seek to collectively deliver 219,940 low-cost rent and 119,940 intermediate homes by 2037 reflecting the extent of need.

C Proposals for residential development are subject to the Threshold Approach to Planning Applications and should follow the fast-track route through planning, where they provide the relevant percentages of affordable housing on gross residential development in the locations or on the land profiles set out in Table 3.2 and Table 3.3:

Table 3.2: Affordable housing requirements for schemes of 36 homes or more

Location or land profile[32]	**Affordable housing requirement**	**Circumstances under which the threshold affordable housing requirement is altered**	**Altered affordable housing requirement**
Location band A	35 per cent	Development is for 100% social rent homes OR 100% Key Worker Living Rent Homes in the case of BtR development	25 per cent
Location band B	25 per cent	Development is for at least 80% social rent homes OR at least 80% Key Worker living rent homes in the case of BtR	20 per cent
Location band C	20 per cent	None	NA
Green Belt land	50 per cent	Development is proposing significant transport infrastructure delivery	35 per cent
Public sector land	40 per cent	Development is proposing significant strategic transport (or in some limited cases – subject to agreement with the GLA – strategic health) infrastructure delivery OR is part of a Public Sector Land Portfolio Agreement with the Mayor	25 per cent
Industrial land	35 per cent	None	NA

Table 3.3: Affordable Housing requirements for schemes of 10-35 homes

Location or land profile[33]	**Affordable housing requirement**	**Circumstances under which the threshold affordable housing requirement is altered**	**Altered affordable housing requirement**
Non-Green Belt land	20 per cent	None	NA
Green Belt land	50 per cent	None	NA

D In addition to the threshold levels set out in C, development proposals for schemes of 10 homes or more should provide the following to take the fast-track route through planning:

(1) a tenure split of at least 60 per cent low-cost rent homes and 40 per cent intermediate homes; or

(2) a tenure split that is acceptable to the borough or the Mayor when providing 75 per

cent or more affordable homes; or

(3) in the case of BtR development a tenure split of at least 30 per cent Key Worker Living Rent homes and a maximum of 70 per cent at a range of genuinely affordable rents.

E Where the relevant thresholds set out in C and D(1) are exceeded, the tenure split for affordable housing provided above the relevant threshold is flexible.

F Proposals for older persons' accommodation are subject to the Threshold Approach to Planning Applications and should follow the fast-track route through planning, where they provide the relevant percentages of affordable housing on gross residential development in the locations or on the land profiles set out in Table 3.2. In terms of tenure split requirements, this may differ from that set out in D(1) and (2) where acceptable to the Mayor or the LPA.

G Development proposals for the demolition and replacement of affordable homes should follow the fast-track route where 50 per cent of the additional housing is affordable and continues to meet the criteria set out in D and HN2 Protecting and reshaping housing stock parts A(1) and (2)

H Development following the fast-track route through planning should undergo an Early Stage Viability Review if substantial implementation of the scheme has not been made within two years, or a period agreed by the borough, of permission being granted.

I Development proposals following the fast-track route through planning will not need to submit viability information for scheme amendments, provided that the development continues to meet the criteria set out in C and D.

J Development should:

(1) ensure affordable housing is provided on site other than in exceptional circumstances where it is demonstrated that this cannot be achieved, or where off-site provision would result in a higher level of affordable housing or affordable housing that more effectively addresses housing need; and

(2) only provide payment-in-lieu contributions exceptionally where acceptable to the LPA, or the Mayor for referable applications, calculated in line with the Mayor's Viability guidance; and

(3) ensure off-site provision or payment-in-lieu contributions deliver affordable homes that are additional to those required under C and D on any associated site.

K Development will follow the viability tested route through planning and provide viability information in support of the application, where:

(1) it is not possible to meet the requirements set out in C and D; or

(2) development will result in the demolition or loss of existing affordable housing, or is an estate regeneration scheme, except where G applies; or

[32] For schemes on Green belt land – regardless of location band or land profile, Green belt threshold affordable housing requirement applies

[33] For schemes on Green belt land – regardless of location band or land profile, Green belt threshold affordable housing requirement applies

(3) a payment-in-lieu contribution is provided, with the exception of developments providing 10-35 homes, where the LPA assesses that the contribution is equivalent only to the relevant threshold level and tenure of affordable housing set out in C and D.

L Development proposals for Purpose-built Student Accommodation are subject to the Threshold Approach to Planning Applications and should follow the fast-track route through planning, where they provide either:

(1) On-site affordable student accommodation at the relevant percentages in the locations or on the land profiles set out in Table 3.2; or

(2) On-site affordable student accommodation up to a maximum of 10 per cent below the relevant percentages in the locations of on the land provides set out in Table 3.2, together with a payment-in-lieu contribution for conventional affordable housing to off-set the reduction in on-site delivery; or

(3) On-site conventional affordable housing at the relevant percentages in the locations or on the land profiles set out in Table 3.2.

M Development proposals for Large-scale Purpose-built Shared Living are subject to the viability tested route through planning and should provide a payment-in-lieu contribution towards conventional affordable housing, except where on-site conventional affordable housing is provided at the relevant percentages in the locations or on the land profiles set out in Table 3.2, enabling applications to follow the fast-track route through planning.

N Development proposals following the viability tested route through planning should:

(1) demonstrate that there are genuine barriers to delivery that mean the scheme would not be able to proceed on a policy compliant basis;

(2) demonstrate that the scheme is providing the maximum possible level of affordable housing;

(3) undergo an Early Stage Viability Review if substantial implementation is not achieved within two years, or a period agreed by the borough, of permission being granted

(4) undergo a Late Stage Review when 75 per cent of the units in a scheme or final phase or plot are occupied, or a requirement agreed by the borough

(5) undergo Mid Term Reviews prior to implementation of phases for larger schemes

O When assessing the maximum possible level of affordable housing proposed, decision makers should consider whether the assessment and its conclusions are objective, reasonable and realistic, whether this shows that the scheme is deliverable and the weight to be given to the assessment and the proposed level of affordable housing as part of the overall planning balance.

P Development that seeks to reduce the level of affordable housing in an existing planning consent, or that results in a less affordable tenure, should be scrutinised carefully. The applicant should provide a robust justification, including how circumstances have changed since the main consent was issued. Where the level or tenure of affordable housing is reduced below the relevant threshold or other requirement set out in this policy, it will be assessed through the Viability Tested Route. The decision-maker should have regard to the potentially significant reduction in public benefits that changes to

affordable housing may cause and give this appropriate weight in the overall planning balance, alongside the wider merits of the scheme.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.35 The percentages set out in the Threshold Approach to planning applications apply to both market sale and Build to Rent housing.

3.36 The fast-track route through planning does not require a viability assessment to be submitted at the planning application stage. Local planning authorities should not impose additional requirements for applicants in order to meet the fast-track route.

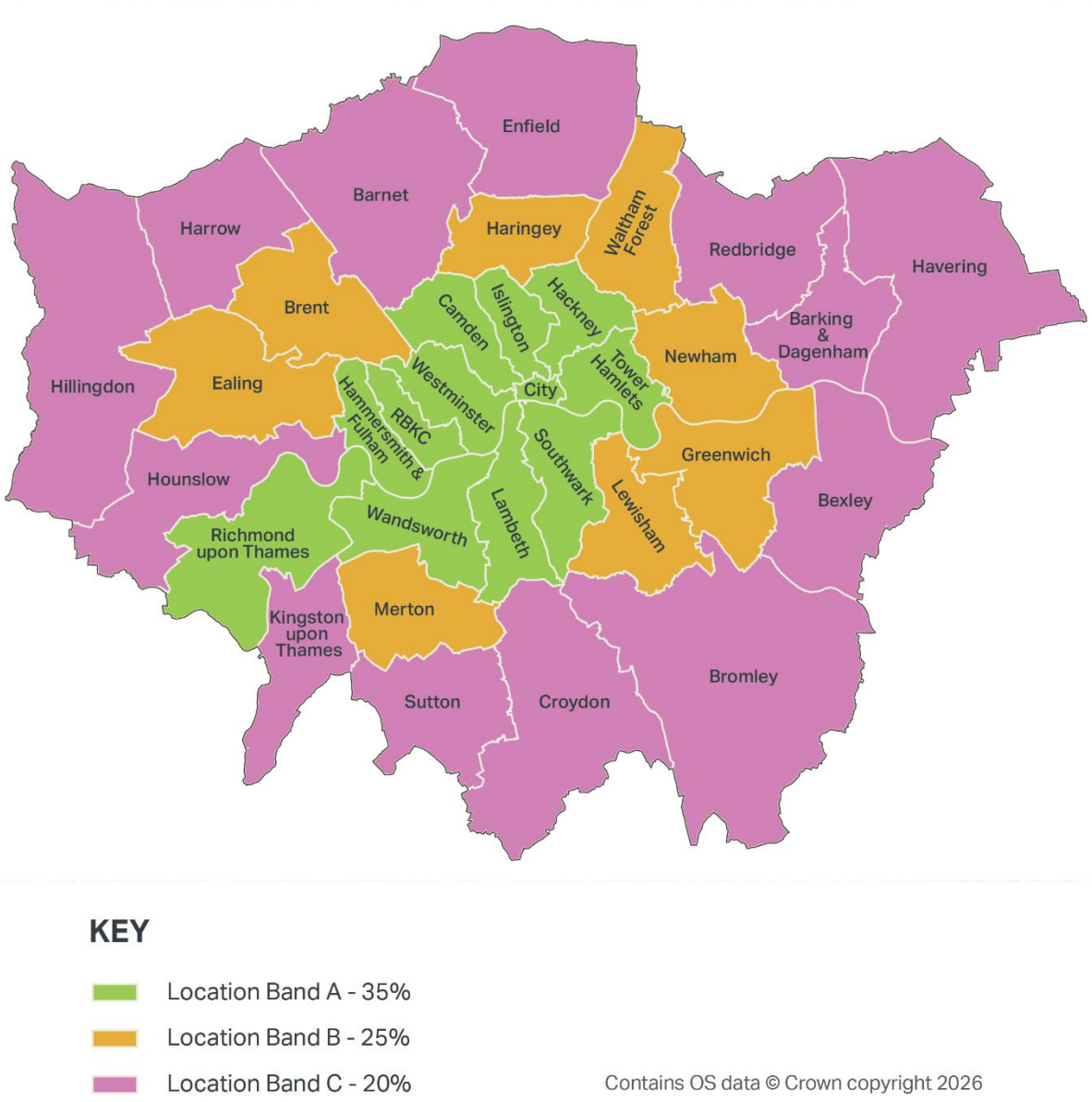
3.37 Where the fast-track route cannot be taken, the viability tested route will scrutinise the viability information provided to assess the maximum possible contribution to affordable housing that a scheme can make. Viability information is expected to be provided in accordance with the Mayor's Viability guidance, submitted in a standardised and accessible format and treated transparently. Inputs, assumptions and conclusions will need to be fully justified, objective and impartial, recognising the public interest.

3.38 Comprehensive review mechanisms will be applied to schemes to ensure that affordable housing is increased if market conditions improve viability over time. This includes an Early Stage Review for all applications regardless of the route they follow, to incentivise an applicant to build out the permission.

3.39 Applicants are expected to maximise the delivery of affordable housing through grant and other forms of subsidy where applicable and available, engaging in early discussions with the council, RPs and the GLA to explore availability, and improve the design, integration and management of different tenures, reflecting council and RP requirements. Where grant is, or is likely to be available, this should be taken into account as part of the planning application, and the applicant should commit to a higher level of affordable housing.

3.40 Local Planning authorities that fall into location B or C, may explore increasing the threshold through their local plan to the relevant adjacent higher locational threshold if economic conditions improve and it can be demonstrated to be deliverable through robust local viability evidence. Any threshold set should cover the entire extent of the local planning authority boundary and should not exceed the threshold of location A unless there is clear evidence that this can be delivered in practice.

Figure 3.2: showing the locational bands for the Threshold Approach



3.41 The 40 per cent requirement of sites on public sector land set out in Table 3.2, applies to any new portfolio agreements made on or after the publication of this London Plan. Sites permitted within portfolio agreements made prior to this date remain in place and subject to the framework in place at the time of their creation and are not superseded by this Plan.

3.42 The measurement for affordable housing is expected to be habitable rooms, with habitable rooms in affordable and market homes being of a comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure affordable housing provision using habitable floorspace. To enable comparison, applicants are expected to present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace. Where a scheme comprises both market sale and Build to Rent homes, while the relevant parts of the policy will apply to the market or rent element, the scheme will be assessed as a whole, with affordable housing calculated as a proportion of total habitable rooms across

the scheme.

3.43 Where in-lieu payments are justified for schemes of 10-35 homes (in accordance with the approach set out in policy) plan-making authorities may set tariff rates for contributions provided they are determined in line with the approach set out in the Mayor's Affordable Housing guidance.

3.44 When opting to provide a proportion of the affordable housing required for Purpose-built Student Accommodation (PBSA) schemes as an affordable housing payment in-lieu, applications are expected to take the following steps:

(6) Identify the amount of Net Internal Area floorspace relating to the proportion of floorspace which will be offered as an affordable housing payment in-lieu.

(7) Determine the capitalised value of the floorspace on the basis of both market tenure PBSA and as affordable tenure PBSA.

(8) Subtract the two figures in steps 1 and 2 to identify the difference in value which will equate to the required payment in-lieu contribution.

3.45 For Large-scale Purpose-built Shared-living Accommodation, payment-in-lieu of affordable housing is expected to typically be provided as an upfront payment to the LPA. It should be calculated in line with the approach to off-site contributions set out in the Mayor's Affordable Housing guidance. Applicants that meet these expectations will not be subject to a Late Stage review.

3.46 Given the extent of affordable housing need identified in the 2026 SHMA, the delivery of a borough's housing target should not be relied on as a reason for reducing affordable housing delivery or other policy requirements

3.47 Significant strategic transport infrastructure is defined as the schemes set out in MBUL1 Spatial Strategy. Strategic health infrastructure is defined as schemes that will make a significant contribution, particularly to acute healthcare requirements set out in Annex F (e.g. new hospital facilities).

3.48 The Mayor's preferred affordable housing tenures are set out below. Other affordable housing products may be acceptable if they are genuinely affordable, meet the definition of affordable housing and can achieve the relevant eligibility and affordability criteria.

- Social Rent
- Key Worker Living Rent
- London Living Rent
- London Shared Ownership

3.49 To ensure affordable homes remain affordable to the households that need them, the following criteria apply:

- Key Worker Living Rent and London Living Rent rents set according to guidance provided on the GLA website
- Intermediate Rent and Sale is affordable to households on incomes up to the maximum threshold published by the Mayor, and homes should be provided for a range of incomes below this threshold

- Annual housing costs including mortgage, rent and service charge, should be no greater than 40 per cent of net household income based on household income limits.

3.50 In terms of priority access to intermediate housing for those on local intermediate registers, whilst this is the expectation for new development and re-lets of intermediate rent homes, it is recognised that it may not be possible for London Shared Ownership re-sales, where this might cause a delay in the sale.

3.51 In the case of intermediate tenures, LPAs will need to assess affordability in accordance with the above criteria. Eligibility criteria may be supplemented by other eligibility or priority criteria for intermediate homes that reflect local need or circumstance and LPAs should work with housing providers to apply these criteria through any adopted intermediate housing allocations policies and processes. The Mayor also encourages LPAs and housing providers to prioritise key workers who also meet the eligibility criterion above, for intermediate homes. Boroughs may also prioritise those in other occupations for which there is a need locally; and/or give additional priority to those in occupations for which there is the greatest need; and/or prioritise staff of specific institutions for homes developed on land owned by or close to that institution.

3.52 Any additional eligibility or priority criteria will only apply for three months after practical completion of the unit. If a home has not been sold or let to a household who meet additional criteria within that period, it can be made available to any household that meets the London Plan criteria above, to ensure the intermediate homes are not left vacant.

3.53 The threshold levels set out in policy will be monitored and reviewed at appropriate points in time to determine how it is influencing delivery rates. Any changes to the thresholds will be made through London Plan Guidance or a focused review of the London Plan.

Rationale

This policy reflects a number of key considerations:

3.54 The extent of affordable housing need in London is high, as evidenced by the levels of homelessness across the city, the vast sums being spent by local authorities on temporary accommodation and the increasing numbers of households, including key worker households, that are very unlikely to secure social rent homes but are priced out of homes for sale or rent on the open market. The SHMA sets out the quantum of affordable housing required to address need over a ten-year period – this demonstrates the importance of developments doing the utmost to maximise levels of affordable housing, particularly when it comes to social rent.

3.55 Not only do sites delivering low levels of affordable housing mean that the gap between need and supply continues to grow, it poses significant opportunity costs which will continue to impact in the medium to long term given land scarcity in London. Moreover, affordable housing's ability to provide cash flow in a development means that providing higher levels of affordable housing forms a vital part of the strategy to increase overall housing delivery. This reduces a site's exposure to market absorption sales rates, which ultimately limit the number of market homes that can be sold and therefore the overall rate that a site can be built out.

3.56 Boroughs have systems in place to allocate social rent homes to those in need of them through their role as the local housing authority. This is however not consistently the case for intermediate housing, whereby opportunities to take up new homes may not be as readily understood by local people that are eligible for them. There is also a lack of parity across London, with only some boroughs having introduced allocations policies and housing registers to better direct intermediate homes towards local need. All boroughs are therefore asked to introduce the relevant systems and processes that will facilitate the future take up of intermediate homes, benefiting many households across the capital, including key workers, regardless of where they currently live.

3.57 The Mayor's 50 per cent strategic target for affordable housing reflects a number of factors. It is vital to retain an overarching ambition for the delivery of affordable housing in order to maximise the opportunities for its delivery, particularly in the context of the continued high level of need. It is considered most appropriate to retain this ambition and preferable to relying on a percentage that may fluctuate through unknowable future delivery rates, that are in turn impacted by macroeconomic cycles and land viability. Conversely, reducing the figure to a level that would currently be more generally viable across London would not reflect the realities of need and the Mayor's duties in relation to inclusion, health and inequality. However, both the level of need (in numerical terms) and the viability context (in relation to threshold affordable housing percentages) are recognised in policy and this aims to strike an appropriate overall balance in the approach. LPAs and applicants are asked to maximise affordable housing delivery with the objective of collectively addressing it.

3.58 The Threshold Approach to Planning Applications, informed by viability testing, recognises what can be achieved in different parts of the city, on different types of land given variations in development values and costs and the potential scope for value growth over the Plan period. This reduces the requirement to provide detailed viability information where affordable housing thresholds are met and is designed to continue to embed affordable housing expectations into land values, deliver certainty to the market, and speed up the planning process by reducing protracted viability discussions, in turn delivering the homes that Londoners need.

3.59 The approach seeks to deliver the highest possible level of affordable housing across boroughs, with the different bands reflecting broader variations in the viability context (and also growth potential over the Plan period). It is led by evidence of viability in the medium term and boroughs could move bands subject to robust evidence of deliverability and if economic conditions improve through the course of the Plan. It seeks to strike a balance between avoiding different requirements in each borough for developers to navigate while allowing scope to reflect key differences across London and potential scope to deliver more affordable housing over economic cycles. The ambition is for London to get back to achieving a minimum of 35% affordable housing on private land across the whole of London, as economic conditions allow.

HN4 Gypsy and Traveller accommodation

Policy aim: To meet the accommodation needs of Gypsy and Traveller and Travelling Showperson households by providing pitches, plots and other culturally appropriate accommodation.

Applies to: plans and applications for Gypsy and Traveller and Travelling Showpeople accommodation

Locations: All

Plan-making

A Plan-making authorities should seek to meet the needs of London's Gypsy and Traveller and Travelling Showpeople communities and should:

(1) adopt the targets set out in Table 3.4 and Table 3.5 as a minimum

(2) make provision for other types of culturally suitable accommodation where there is a need

(3) consider granting permanent permission for temporary sites where these are in suitable locations

(4) identify areas of potential extra capacity within or adjacent to existing sites

(5) provide pitches or plots and other culturally suitable accommodation as part of large scale residential and mixed-use allocations and regeneration proposals where there is scope to do so

(6) identify pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space and landscaping).

B LPAs should allocate a Gypsy and Traveller transit site and/or make provision for negotiated stopping.

C LPAs are encouraged to work collaboratively with providers, community organisations and the GLA with the aim of securing provision for and delivery of permanent pitches, plots, transit sites and other culturally suitable accommodation.

Development management

D Development proposals that would entail the loss of Gypsy and Traveller pitches and Travelling Showpeople plots should secure replacement provision that is equivalent or better in terms of size, quality and suitability of location.

E Where existing Gypsy and Traveller pitches or Travelling Showpeople or Circus People's sites or plots have to be re-located or re-provided, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible.

F Development proposals for new sites should ensure sites will be well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.

G Pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for all, including disabled and older people, and families with young children.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.60 Targets for new permanent pitches and plots set out in Table 3.4 and Table 3.5 are considered to be a minimum in terms of level of provision sought and LPAs are encouraged to exceed these based on local context.

3.61 An estimated 87 transit pitches are needed across London. Transit provision can comprise permanent transit sites or negotiated stopping arrangements. Which type of provision is most appropriate will depend on local circumstances.

3.62 When planning provision for new pitches it is important to consider the wider context both in terms of what type of accommodation households seek and where provision should be made. For example, culturally suitable accommodation might include a combination of pitches and bricks and mortar homes on the same site or group housing to accommodate extended families. Understanding communities' preferences and needs, including targeted engagement, is key to ensuring new provision is culturally appropriate and meets needs in terms of type of accommodation, design, location and layout.

3.63 Involving residents occupying pitches, sites or plots in planning new provision or any unavoidable re-locations should help ensure satisfactory solutions are achieved.

3.64 It is unlikely that all of London's need for pitches can be met on existing developed land. It is therefore expected that Green Belt sites will be needed in some cases, in which case policy PV7 applies.

3.65 To assist boroughs in meeting identified need, Mayoral funding is available through the London Social and Affordable Homes Programme 2026 - 2036 for the provision of new sites and pitches and for refurbishment or remodelling of existing sites and pitches.

Table 3.4: 10 year targets (2027-2037) for net additional permanent pitches

LPA*	**Number of pitches**
Barking and Dagenham	17
Barnet	16
Bexley	39
Brent	55
Bromley	77
Camden	11
City of London	0
Croydon	25
Ealing	11
Enfield	25
Greenwich	53
Hackney	40
Hammersmith and Fulham	24
Haringey	33
Harrow	13
Havering	73
Hillingdon	49
Hounslow	35

Islington	10
Kensington and Chelsea	0
Kingston upon Thames	52
Lambeth	17
Lewisham	12
Merton	9
Newham	34
Old Oak and Park Royal Development Corporation (OPDC)	13
Redbridge	21
Richmond upon Thames	5
Southwark	41
Sutton	16
Tower Hamlets	17
Waltham Forest	20
Wandsworth	7
Westminster	6
Total	876

* Hammersmith and Fulham need is shared with Kensington and Chelsea

Table 3.5: 10-year targets (2027-2037) for Travelling Showpeople permanent plots

LPA	**Number of plots**
Bromley	37
Havering	5
Hillingdon	13
Hounslow	28
Total	83

Rationale

This policy reflects a number of key considerations:

3.66 London must plan to meet the needs of all its residents, including Gypsies, Travellers and Travelling Showpeople. Targets for pitches and plots are introduced in recognition that past delivery has been slow and that need exists for Gypsy and Traveller pitches across London, albeit the level varies from borough to borough. Targets are minimum, reflecting a degree of uncertainty regarding Census data for these groups and given the pattern of historical underdelivery that urgently needs addressing.

3.67 There is a growing recognition that meeting Gypsy and Traveller need is not just about delivering pitches, but culturally appropriate accommodation that recognises Gypsies and Travellers' accommodation preferences. Involving existing or future residents in planning new provision is crucial to ensure that it is fit for purpose.

3.68 Requiring boroughs to consider a range of options for meeting needs, including as part of large scale developments, should make it more likely that suitable sites will be identified

and new pitches delivered. It should also assist in facilitating an inclusive approach to development, that seeks to address the needs of all groups.

HN5 Managing specialist accommodation

Policy aim: To secure the delivery and management of good quality specialist and supported housing that meets the varied needs of Londoners.

Applies to: Applications for Purpose-built Student Accommodation (PBSA), Large-scale Purpose-Built Shared Living (LSPBSL) and Specialist, Supported and Older Person's Accommodation.

Locations: All

Plan-making

H Plan-making authorities should recognise the role that different accommodation types play in diversifying the market and speeding up build-out, and through local plans, should:

(1) seek to meet the need for PBSA, identifying positive opportunities for its contribution to local and strategic objectives, allocating sites for a level of provision that will satisfy targets in Table 3.6

(2) identify if and where spatial concentrations or proliferation of PBSA or LSPBSL accommodation exist compared to conventional housing, and the extent to which it is impacting the ability to ensure mixed, inclusive neighbourhoods and develop policy to address this

(3) plan to meet the need for Specialist, Supported and Older Person's Accommodation using Table 3.7 as a starting point, alongside any local and other relevant evidence, and

(4) take a positive approach to non-traditional forms of housing, including intergenerational and community-led housing, where there is evidence of need and where this does not undermine the requirement to optimise sites set out in MBUL2 Optimising the use of land and site capacity.

I Local Planning Authorities should plan to deliver Specialist, Supported and Older Persons Accommodation in areas that are well-connected to local services, facilities and social infrastructure by public transport.

Development management

J Development proposals for PBSA and LSPBSL accommodation should:

(1) be in locations demonstrated to be well-connected to local services or, where relevant, higher education providers by walking, cycling and public transport, including and as part of, mixed-use regeneration and redevelopment schemes

(2) be carefully located, designed and managed to optimise its impact on neighbourhoods' mixed and inclusive nature and

(3) provide affordable housing in line with Policy HN3 Delivering Affordable Housing.

K Development proposals for LSPBSL should:

(1) be under single management

(2) where the provider issues licences to residents, offer these for a minimum period of three months and

(3) be accompanied by a management plan that demonstrates continued accommodation quality through management and maintenance of the internal and external building and details security and safety procedures, and service arrangements.

L The design of LSPBSL should be of good quality:

(1) placing emphasis on communal living, providing communal facilities and services that includes both indoor and outdoor space that aims to remove barriers to social interaction and encourages engagement and

(2) providing functional personal living space, that does not encourage self-containment.

M Development proposals for Older Person's Accommodation should provide affordable housing in line with Policy HN3 Delivering Affordable housing.

N Development proposals for Specialist, Supported and Older Person's Accommodation should be designed to satisfy the requirements of the intended residents.

O Development proposals for Older Person's Accommodation, and where necessary to meet residents' need, for other specialist/supported housing should ensure pick up and drop off facilities close to the principal entrance suitable for taxis, minibuses and ambulances.

P Affordable PBSA should be secured through a Nomination Agreement for occupation by students of one or more higher education provider(s).

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.69 A positive approach should be taken towards the provision of PBSA in suitable locations to satisfy targets in Table 3.6. London's cumulative PBSA target is for 31,500 bedspaces required in the next decade. Updates on bedspace completions from the baseline date of 2026 will be published as part of the London Plan monitoring updates. Where completions take place between the baseline date and plan start date, these can be netted off from the relevant borough's target.

3.70 Targets contained within Table 3.6 will be kept under review, acknowledging that need for PBSA accommodation may be impacted by contextual changes in the higher education sector.

Table 3.6: PBSA requirement by local planning authority from 2027/28 to 2036/37

Local Planning Authority	PBSA Target (bedspaces)

Barking and Dagenham	300
Barnet	2127
Bexley	-
Brent	1582
Bromley	300
Camden	725
City of London	-
Croydon	1347
Ealing	2003
Enfield	1316
Greenwich	1741
Hackney	662
Hammersmith and Fulham	1049
Haringey	1189
Harrow	781
Havering	1303
Hillingdon	1562
Hounslow	1123
Islington	300
Kensington and Chelsea	300
Kingston upon Thames	300
Lambeth	1023
Lewisham	878
Merton	-
Newham	1576
OPDC	680
Redbridge	1008

Richmond upon Thames	-
Southwark	1737
Sutton	300
Tower Hamlets	1482
Waltham Forest	1192
Wandsworth	1663
Westminster	-
London Total	31,549

3.71 Areas that are well-connected to services and higher education providers (HEPs), provide a starting point for both LPAs seeking to allocate sites to satisfy PBSA provision and applicants seeking to ensure that C(1) is met. A travel distance of 30 minutes (via walking, cycling or public transport) is considered to be well-connected to an HEP.

3.72 Whilst it is incumbent upon the applicant to ensure LSPBSL accommodation and PBSA is carefully located, designed and managed for the positive benefit of mixed and inclusive neighbourhoods, the LPA may wish to use the local plan to define any aspects that might be spatially relevant for an applicant to consider.

3.73 Where all bedrooms in PBSA schemes are provided at a rental cost that qualifies as affordable student accommodation and are maintained in perpetuity through legal agreement or condition, a Nomination Agreement with a higher education provider is not required. There is also no requirement for the higher education provider linked by Nomination Agreement to Affordable PBSA to be located within the borough where the development is proposed.

3.74 LSPBSL development, as a product offering choice in the housing market, should not be subject to a restriction on the groups or demographics that may wish to live there - for example, students, key workers or those requiring emergency or temporary accommodation. LSBPSL management plans are expected to be secured through a Section 106 Agreement.

3.75 Supported, Specialist and Older Persons Accommodation policy applies to accommodation as defined in the glossary of this plan. LPAs should plan for a range of provision, including market, intermediate and social rented, and may wish to take a local approach including through site allocations to cater for needs.

3.76 The Supported Housing (Regulatory Oversight) Act 2023 (SHROA) places a statutory duty on local authorities in England to develop and deliver Local Supported Housing Strategies by March 2027. It requires local authorities to assess the current availability of supported housing (including older person's supported housing) and likely need (including current unmet need) for supported housing for a period of five years from the date that the strategy is published.

3.77 Until such time as local needs assessments are undertaken in accordance with SHROA, Table 3.7 below is provided for local authorities to address local needs. Boroughs may need to draw on local and other relevant evidence, in addition to Table 3.7, regarding the level and type of older person's provision to be sought.

3.78 Table 3.7 should be treated as minima as needs figures for older persons housing do not account for needs within the private market (such as private sector retirement housing) which will form part of wider housing need across London. Local assessments are also not expected to capture this type of specialist older person's accommodation need, and this should be taken into account in any local targets (see the London SHMA). Evidence collected for the Local Supported Housing Strategy, and other relevant evidence[34] is expected to be used as a basis for addressing specialist housing needs.

3.79 The OPDC, as a Mayoral Development Corporation (MDC), is not provided with a needs figure. It is expected that the need for specialist, supported and older persons' housing be accounted for based on a reasonable proportion of need that would occur within the OPDC area, by liaising with respective housing authorities through the local plan process and where necessary, through the development management process.

Table 3.7: Additional supported, specialist and older persons' housing units needed 2025-35

Local authority	Transitional supported housing	Long-term supported housing	Older persons housing*
Barking and Dagenham	60	25	245
Barnet	130	80	1,170
Bexley	25	25	655
Brent	165	40	675
Bromley	85	40	945
Camden	40	10	575
City of London	5	<5	55
Croydon	215	10	1,260
Ealing	130	0	1,115
Enfield	85	55	400
Greenwich	190	20	460

[34] For example the Supply and Demand for Supported Housing in London (2026) final report for GLA; Beatty, C.B. and Sanderson, E. CECSR, Sheffield Hallam University; Greater London Authority Mental Health Specialist and Supported Housing: Research & Market Development Project, Final Research Report, Imogen Blood and Associates; London SHMA, GLA (January 2025)

Hackney	325	30	775
Hammersmith and Fulham	25	5	350
Haringey	135	0	665
Harrow	35	35	600
Havering	60	55	515
Hillingdon	100	60	425
Hounslow	60	40	655
Islington	300	15	525
Kensington and Chelsea	145	0	750
Kingston upon Thames	5	25	120
Lambeth	370	20	1,330
Lewisham	55	10	825
Merton	25	20	460
Newham	200	70	680
Redbridge	50	50	615
Richmond upon Thames	30	30	510
Southwark	310	105	1,050
Sutton	70	10	745
Tower Hamlets	385	125	825
Waltham Forest	175	10	635
Wandsworth	255	90	1,205
Westminster	235	5	990
London	4,490	1,110	22,805

Source: The Supply and Demand for Supported Housing in London, Final Report for GLA, Sheffield Hallam University, 2026

* Older persons' housing: for people aged 55+ with support needs. Excludes older persons' housing for sale or rent on the private market

N.B Column totals may not match totals displayed due to rounding

3.80 Design and access statements for specialist and supported accommodation are expected to demonstrate how the requirements of the specific user group have informed the design and functionality of the final proposal.

Rationale

3.81 London is a diverse city and there is a need to plan positively for some specialist housing needs and manage their impacts, particularly in relation to availability of land for conventional housing.

3.82 A positive approach to the provision of PBSA will ensure a thriving higher education sector is supported and will offer students choice of accommodation, in turn alleviating pressure on the private rented sector, freeing up homes that students might otherwise occupy. However, both PBSA and LSPBL require careful planning to ensure that schemes are well designed and delivered in suitable locations, to maximise their benefits, and to reduce knock-on effects such as overconcentration in certain areas. To help to achieve this, PBSA targets have been determined through a methodology that seeks to align need from HEPs with appropriate locations for PBSA development, as well as to ensure requirements are appropriately spread across the capital.

3.83 It is the case that some forms of specialist housing, such as community-led housing, may help to enhance social cohesion and increase well-being. As such the policy seeks a positive approach to its planning at the local level, where relevant.

3.84 Supported, Specialist and Older Persons' Accommodation is a varied market comprising many different types and formats of housing that can meet a wide range of needs, as appropriate for a diverse city such as London. For example, provision for those requiring additional support after leaving hospital may be quite different from that for victims of domestic violence. Even housing geared towards those within the same demographic may be wide-ranging – for example older persons' housing may or may not have tailored specialist care elements and will vary in its offer as part of providing choice based on a persons' requirements and socio-economic status.

3.85 Given London's ageing demographic, it is important that LPAs plan for a range of provision, both market and social rented, to cater for needs.

HN6 Build to Rent

Policy aim: To facilitate a housing product that addresses identified housing needs; and to encourage boroughs to take a supportive approach to the BtR sector.

Applies to: Build to Rent (major development)

Locations: all

Plan making

A Plan-making authorities should take a positive approach to BtR development and its role in meeting the housing targets set out in policy HN1 Increasing London's housing stock which may include allocating sites in full or in part for this type of development through Local Plans.

Development management

B Development proposals for BtR development should:

(1) ensure homes are secured as BtR under covenant for at least 15 years and that a clawback mechanism is in place in the event that the covenant is broken

(2) provide self-contained homes that are separately let

(3) consider the impact of service charges on long-term affordability in line with policy HN8 Housing design, and

(4) provide affordable housing as discounted market rent and including Key Worker Living Rent homes, in line with HN3 Delivering affordable housing, ensuring these homes are secured in perpetuity as affordable housing.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.86 BtR is a type of conventional housing that meets the criteria set out above. As such, it is subject to policies of this plan which apply to residential development including but not limited to HN7 Housing size mix, HN8 Housing Design and HN9 Accessible housing. BtR should not be conflated with alternative accommodation offers such as LSPBSL or hostel/houses in multiple occupation (HMO) development.

3.87 The covenant to secure BtR homes for the rental market for a minimum period of 15 years, together with a clawback agreement, should be secured through a Section 106 Agreement. During this period, private rented homes are retained in single ownership and overall ownership of the scheme can only change if the entire scheme remains as BtR. If individual homes are sold the covenant is broken and a clawback review is triggered. A valuation of the market and affordable homes is expected to be included within the Section 106 Agreement to enable the level of clawback to be calculated in the event the covenant is broken. Affordable homes proposed as part of any BtR scheme should also be secured via a Section 106 agreement.

3.88 Development proposals for BtR development are expected to carefully consider service charge costs at the design stage in accordance with policy HN8 Housing design. BtR development can come in various formats and providers should consider how affordability can be increased through offering differing levels of amenity or opting for lower maintenance provision to reduce expenditure.

3.89 Further information on BtR development is set out in the Mayor's London Plan guidance.

Rationale

This policy reflects a number of key considerations:

3.90 BtR will need to play an important role in London's housing market over the coming decade.

3.91 BtR is a type of conventional housing that addresses identified housing needs, providing greater choice for Londoners. Crucially, it also works to diversify sites and in turn speeds up their build out – helping deliver against identified housing targets. This is due to BtR's

ability (as a rental product) to reduce a development's exposure to market absorption sales rates which limit the number of market homes that can be sold and slow the overall rate of site build out. BtR is expected to continue to play an important role in London's housing market over the coming decade.

HN7 Housing size mix

Policy aim: To ensure that new development provides a range housing sizes, to meet Londoners' needs and build strong and inclusive communities, without undermining viability and the ability to achieve higher housing targets.

Applies to: All applications for conventional residential accommodation

Locations: All

Plan making

A Plan-making authorities should take into account local evidence of need, including that derived through local registers for social and intermediate housing, if preparing local policy or supplementary plans on housing size mix for affordable homes.

B Where an LPA wishes to prepare local policy or supplementary plans on housing size mix for market homes, this should be based on London's Strategic Housing Market Assessment.

Development management

C Development proposals should provide a range of unit sizes, determined through:

(1) evidence set out in London's SHMA

(2) guidance published by the plan-making authority in relation to housing size mix in affordable tenures, and

(3) the contribution the scheme makes to ensuring a mixed, inclusive neighbourhood, having regard to the site's relationship to its surroundings, including transport connectivity, services, and the range and types of homes already present.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.92 Applicants, decision makers and plan-makers are expected to take a pragmatic approach to determine housing size mix, reflecting London's strategic evidence as well as the site's surrounding context described through the requirements set out in MBUL2 and set out in any accompanying design and access statement.

3.93 While London's strategic evidence should be relied upon to understand housing need overall and the approach to market housing, housing registers for affordable tenures (in offering a live picture of local need) provide a firm basis for any LPA producing

supporting guidance and/or discussions over appropriate size mix with respect to affordable housing.

3.94 Town centres or highly accessible locations may better serve higher concentrations of smaller homes, but thought should still be given as to how family-sized homes can be incorporated into any scheme for best effect. In lower density areas, size mix may provide opportunities to redress any overconcentration of homes of the same size, introducing more choice into the local market.

Rationale

This policy reflects a number of key considerations:

3.95 London is a single housing market area and the majority of London's need lies in one and two bed homes that can more adequately provide for those wishing to form new households or downsize across London. The need for larger homes is significantly lower overall.

3.96 However, family-sized housing accounts for a much larger proportion of need in affordable tenures than in market homes. Boroughs (through their responsibility as the local housing authority) will hold key information on affordable housing need and can play a key role in addressing it through their allocations process. The focus in the policy is therefore on enabling local flexibility and variation with respect to affordable housing,

3.97 This does not apply with respect to market housing. With the need to optimise sites and deliver against high housing targets, and challenging viability, imposing extra local requirements would risk undermining viability and deliverability, without any clear basis in evidence.

HN8 Housing design

Policy aim: To ensure that new residential development is of high-quality design and provides homes that meet Londoners' needs now and into the future.

Applies to: Residential development

Locations: All

Development management

A Residential development should meet the following criteria:

(1) Within the overarching aim of optimising site capacity and enabling the optimal orientation and layout of a proposal, housing development should maximise the provision of dual aspect dwellings and seek to minimise the provision of single aspect dwellings. Where single-aspect dwellings are proposed, it should be demonstrated that they will have adequate passive ventilation, daylight and privacy, and avoid overheating.

(2) All residential habitable rooms should receive natural light and have openable windows. This excludes the kitchen and/or dining room where they form part of an open-plan room that receives natural light. Where any fixed-shut windows are absolutely necessary for noise and pollution reasons, the residential unit should be

provided with at least one habitable room that has openable windows.

(3) Be tenure-blind to ensure that affordable housing units have the same external appearance as private housing. All housing entrances will need to be well integrated with the rest of the development and should be indistinguishable from each other.

(4) Activate the ground-floor frontage by providing front doors with direct access to the street for ground-floor apartments and maisonettes.

(5) Internal communal lobbies and circulation spaces should be designed to be welcoming, durable, well-lit and where possible naturally lit and ventilated.

(6) Incorporate at least 10 square metres of good-quality and accessible playspace per child. This provision should provide a stimulating environment for children of all ages and be safely accessible from the home by children and young people independently. Where feasible, landscaping should be designed to be playable.

B Private internal and outside spaces for individual dwellings should:

(1) meet the Nationally Described Space Standard (NDSS) that applies to all tenures and all residential accommodation that is self-contained (for M4(3) dwellings see requirements of policy HN9 Accessible housing)

(2) provide a minimum floor to ceiling height of at least 2.4m for at least 75 per cent of the gross internal area (GIA) of each dwelling.

(3) provide sufficient functional entrance space and storage.

(4) where there are no higher local standards in the borough Local Plan, provide a minimum of 5 sqm. of private outside space for 1-2 person dwellings and an extra 1 sqm. for each additional occupant. All of the minimum area provided must have a depth and width of at least 1.5m. This space does not count towards the minimum GIA space standards. Where feasible provide space for clothes drying.

C Communal outside amenity space provided in housing developments should:

(1) be overlooked by residential dwellings to enable passive surveillance

(2) not be segregated by tenure.

(3) incorporate green space.

(4) provide places to sit and relax with a comfortable level of wind and traffic noise.

(5) where appropriate, provide opportunities for food growing.

D Where practical, family homes should predominantly be located on the lower six floors of tall residential buildings or have easy access to appropriate outside spaces provided on higher floors, to provide convenient access to, and overlooking of, outside play and amenity spaces.

E The long-term maintenance and servicing of the building, including the replacement of external components at height, should be addressed in the design of the building and choice of materials that will simplify the maintenance process and reduce future costs.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant)

should take account of the following:

3.98 When designing residential development, designers should consider the layout of individual buildings and the dwellings within them. Careful design can ensure that shared areas are a pleasant, inclusive and sociable extension to the home and help build supportive communities. Shared entrances should be safe, visible and identifiable from the public realm while offering shelter to users. It is also important that that there is sufficient space and storage in the home near the entrance (threshold space) to enable storage for items such as buggies, walkers and coats and a space to sit and put on shoes. 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. Engaging in early discussions with the Register Providers will help improve the design, integration and management of different tenures within the development.

3.99 The following should be taken into account when considering the provision, location and design of single-aspect dwellings in a development:

- Single-aspect south-facing dwellings are most affected by solar gain/overheating while single-aspect north-facing dwellings can suffer from a lack of direct sunlight during the winter months.

- Dual-aspect can provide some mitigation when the dwellings face onto particularly noisy or polluted environments, by providing the option to open windows on a quieter side of the building

- Increased ceiling height and/or having bay windows can optimise daylight and sunlight and allow buildings to be closer together than they might otherwise have been.

3.100 In determining comfortable levels of wind and traffic noise in outside communal spaces applicants are encouraged to use up to date wind and microclimate standards such as the Lawson Wind Comfort Criteria and the World Health Organization's (WHO's) Environmental Noise Guidelines.

3.101 The GLA provides a tool for estimating population yield from new housing development and an indication of the possible number and ages of children that could be expected to live in a new housing development of a given bedroom or tenure mix. Formal play provision should normally be made on-site and provide at least 10 square metres per child. This space may be provided on podiums where that is the most appropriate location for it. Where development is to be phased, there should be an early implementation of play space.

3.102 Off-site provision, including the creation of new play 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 400m of the development and be accessible via a safe pedestrian 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.

3.103 The design stage is crucial to the costs of maintenance and, as a result, for service

charges for residents throughout the lifetime of the building. Where appropriate and practical, the following can be considered and implemented in the design of the development:

- design features that minimise ongoing cost to the residents, even though they may have a higher initial cost.
- ensuring components and assets used in the development are of sufficient quality to ensure maximum lifespan for replacement and minimal repair costs
- balancing the number of residents who will benefit from a service with the cost of maintenance and replacement.

Rationale

This policy reflects a number of key considerations:

3.104 Good residential quality is not just a matter of comfort and safety; it is essential for maintaining both mental and physical health. This involves designing homes that cater to residents' lifestyles and degree of choice, as well as fostering a sense of comfort and belonging.

3.105 This Plan supports higher densities in appropriate locations to make the best use of land and accommodate more housing. The housing design requirements of this policy will be a vital means of ensuring that these new homes are of good quality, and fit for purpose and meet the needs of residents now and in the future.

3.106 Given the vast majority of new homes delivered over the Plan period will need to be flats, it is particularly important that shared indoor and outside spaces are well designed.

3.107 The overarching requirement to optimise sites and layout means that it is not always possible to deliver dual-aspect homes, but it is important – within these constraints – to maximise their provision given that they have many inherent benefits over single-aspect dwellings. These include better daylight, a greater chance of direct sunlight for longer periods, natural cross-ventilation, a greater capacity to address overheating, pollution mitigation, a choice of views, access to a quiet side of the building, greater flexibility in the use of rooms, and more potential for future adaptability by altering the use of rooms. Single-aspect dwellings are more difficult to ventilate naturally and can be more susceptible to overheating.

3.108 The requirements for minimum internal and private outside spaces and higher ceilings than the NDSS are particularly important in London given its dense urban environment, the predominant and unique flatted nature and higher density of new build housing provision. The minimum area and dimensions for the private outside space in the new policy are to ensure the space provided is functional and accessible. The minimum floor-to-ceiling height of 2.4m in new housing helps ensure they provide adequate quality, especially in terms of daylight penetration, ventilation and cooling, and sense of space. This context also means it is particularly important that shared indoor and outside spaces are well designed.

3.109 The level of service charges over time is of particular importance for affordable homes but it can also be a significant factor for leasehold flats.

HN9 Accessible housing

Policy aim: To provide housing choice for those with accessibility requirements, including in different tenures.

Applies to: Various types and sizes of residential development.

Locations: All

Development management

A Development proposals for residential development should:

(1) provide at least 10 per cent affordable homes that meet Building Regulation requirement M4(3)(2)(b) 'wheelchair-accessible dwellings'

(2) provide at least 10 per cent market homes that meet Building Regulation requirement M4(3)(2)(a) 'wheelchair adaptable dwellings'

(3) ensure all other homes within the scheme meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'

(4) apply M4(3) wheelchair user dwelling standards to all approach routes, including the vertical circulation in the common parts of blocks of flats.

B M4(3) homes within a scheme should:

(1) be delivered across a range of housing sizes

(2) be prioritised on the ground floor where possible, with provision on upper floors also supported where buildings have two or more lifts

(3) meet the relevant minimum gross internal floor area set out in Table 3.8 and

(4) in the case of homes not allocated by the local authority make a demonstrable effort to ensure occupation by disabled persons – actively marketing to disabled people first, for at least four months prior to completion and at least two months post-completion.

C Development proposals should, where possible, meet the following noise performance levels 58 L'nT,w for maximum impact sound transmission in new build development and conversions to residential.

D Development proposals that result in a loss of wheelchair user homes should be resisted, unless they are replaced by at least the existing overall floorspace within the same tenure.

E All major non-self-contained residential accommodation should include:

(1) Wheelchair-accessible approach routes, entrances, circulation areas and communal areas

(2) Wheelchair-charging facilities

(3) at least one wheelchair-accessible unisex toilet at entrance level in the waiting area of building/s and on all floors with communal areas.

F Development proposals for PBSA should provide at least:

(1) 4 per cent (or one room, whichever is greater) wheelchair-accessible bedrooms

(2) 1 per cent (or one room, whichever is greater) wheelchair-accessible bedrooms with a tracked hoist system and a connecting door to an adjoining (standard) bedroom

(3) 5 per cent easily adaptable bedrooms for independent use.

G Wheelchair-accessible and/or adaptable student bedrooms should be delivered across a range of tenures and buildings and, where possible, be prioritised on the ground floor, with provision on upper floors also supported where buildings have two or more lifts.

H Development proposals for LSPBSL developments should provide 10 per cent of units as wheelchair-accessible, and where possible be prioritised on the ground floor, with provision on upper floors also supported where buildings have two or more lifts.

I To meet accessible housing requirements in schemes of 36 homes or more, applicants should ensure the ongoing involvement of an access professional to support compliance from conception to completion and the design and access statements (DAS) should be approved by an access professional[35].

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

Table 3.8: Minimum gross internal floor area for wheelchair-user (M4(3)) dwellings

Type of dwelling	Type of dwelling	Minimum gross internal floor areas in square metres	Minimum gross internal floor areas in square metres	Minimum gross internal floor areas in square metres
Number of bedrooms (b)	Number of bed spaces (b)	1-storey dwellings	2-storey dwellings	3-storey dwellings
1b	1p	48	N/A	N/A
1b	2p	58	N/A	N/A
2b	3p	73	94	N/A
2b	4p	87	104	N/A
3b	4p	92	109	119
3b	5p	103	120	130
3b	6p	113	130	140
4b	5p	108	125	135
4b	6p	118	135	145
4b	7p	128	145	155

[35] such as a housing Occupational Therapists or access consultant accredited by the National Register of Access Consultants

4b	8p	138	155	165
5b	6p	123	140	150
5b	7p	133	150	160
5b	8p	143	160	170
6b	7p		155	165
6b	8p		165	175

3.110 When calculating the proportion of wheelchair user homes required, figures should be rounded up to the nearest integer. It is expected that planning conditions will be used to secure M4(2), and M4(3(2)(a and M4(3)(2)(b) dwellings by tenure. Planning conditions are expected to specify the:

- number and/or percentage of dwellings by tenure that should comply with Part M4(2)
- number and/or percentage of dwellings by tenure that should comply with Part M4(2)(a) wheelchair adaptable standards
- number and/or percentage of dwellings by tenure that should comply with Part M4(3)(2)(b) wheelchair-accessible standards

3.111 Each application for residential development will be expected to confirm the above information at both approval and completion stages. Information at completion stage should also be provided on the accessibility standard achieved per size typology (i.e. x no. of y bed units) and by tenure.

3.112 In requiring at least 10 per cent of market homes to meet Building Regulation requirement M4(3)(2)(a) 'wheelchair-adaptable dwellings' this should be seen as a baseline requirement. It does not preclude provision of M4(3)(2)(b) 'wheelchair-accessible' market dwellings where a developer or applicant considers scope exists to do so (either as part of the 10% or in addition to it). Priority should be given to locating M4(3) wheelchair user dwellings on the ground floor as far as possible. Where there are two or more lifts, provision is supported throughout the building, including on higher floors. For buildings with only one lift, priority must be given to locating M4(3) on the ground floor wherever possible, however wheelchair user dwellings on lower floors (typically defined as floors 1 – 6) may be acceptable, with preference given to the lower of these floors.

3.113 As part of ensuring the occupation of M4(3) homes by disabled people, Section 106 agreements for new major residential developments are expected to include the marketing requirements set in policy. This may include information in all general marketing on the specific accessibility features of the M4(3) dwellings for all sales and lettings (first and subsequent). Marketing plans are expected to be approved by the LPA, prior to the commencement of marketing activities for the development or commencing superstructure works (whichever is sooner). A marketing compliance completion report is also expected to be approved by the LPA prior to homes being sold or let.

3.114 Private outdoor space should be provided in addition to the minimum gross internal floor areas set out in Table 3.8.

3.115 It is recognised that over time the definition of a 'wheelchair user home' has changed. However, where development proposals will result in homes being demolished, it is expected that the applicant will make a demonstrable effort to determine whether existing stock comprises wheelchair user dwellings and ensure replacement as part of any new build, providing information which justifies the approach though a planning application.

3.116 It is recognised that there may be some exceptional circumstances where this policy may need to be flexibly applied where it is not possible to achieve step-free access to a dwelling entrance, for example due to site constraints or limited/no scope to install a lift. These circumstances include, e.g. on upper floors, in blocks of four storeys or less; some small-scale infill developments; flats built above existing commercial units or garages; and stacked maisonettes where the potential for decked access to lifts is restricted.

3.117 The best practice levels set out in policy for maximum impact sound transmission, should be explored and met wherever possible. This expectation is for self-contained and non-self-contained accommodation.

3.118 It is expected that planning conditions will be used to secure noise levels set out in policy, and if achieved, will mean that post-completion testing is not required.

3.119 Figures 52 and 54 and 31 and 32 of the BS8300:2:2018-2 provide assistance to applicants in delivering wheelchair accessible student bedroom requirements.

3.120 LSPBSL wheelchair accessible units should meet Part M volume 2 of the Building Regulations and:

- include kitchenettes that meet Diagram 16 in Part M volume 2 of the Building Regulations; and
- have wheelchair accessible kitchen facilities on the same floor, meeting 19.1 of BS8300:2:2018-2 and containing at least one additional wheelchair accessible oven, positioned 1050 to 1080mm from finished floor level to the oven centre, with a pull-out shelf underneath, with 700 to 750mm clear knee space underneath.

3.121 The design and access statement is expected to:

- demonstrate how relevant engagement has been taken into account in accordance with MBUL8 Inclusive Design, part C(3);

- include floorplans demonstrating accessible layouts, and the gross internal floor areas of all units, including by dwelling type and number of bedrooms/bedspaces;

- consider relevant standards and good practice relating to accessible housing, such as that set out in 3.124; and

- explain how the same, or greater levels of access will be achieved, where alternative solutions are proposed.

3.122 To ensure that residential development proposals meet the accessible housing requirements set out within this policy, decision-makers may wish to secure through legal

agreement the involvement of an access professional to support compliance.[36]

3.123 Publicly available management plans for all residential development secured by condition or legal obligation are encouraged.

3.124 All residential development is encouraged to meet standards and good practice, such as the BS8300:2:2018 Design of an accessible and inclusive built environment and Habinteg's 2024 Inclusive Housing Design Guide.

3.125 Accessible housing requirements may need to be balanced against other considerations, such as heritage or security. In achieving an appropriate balance, decision makers should consider barriers to access to and use of buildings, the advice of local authority officers and access professionals[37] and the views of local access groups.

3.126 All major residential developments are encouraged to complete a post-occupancy evaluation with occupants within 12 months of occupation to remove barriers, provide learning and improve design.

Rationale

This policy reflects a number of key considerations:

3.127 Ensuring housing choice for those with accessibility requirements is vital in meeting the needs of disabled and older Londoners and ensuring a genuinely inclusive city. This means supporting disabled Londoners housing needs to be met, through ensuring that adaptations are considered as part of the build – and so improving disabled people's and carers' wellbeing, employment opportunities and spending power.

3.128 Notwithstanding the prioritisation of wheelchair user homes on the ground floor of development, in residential developments with two or more lifts provision of wheelchair user homes may be catered for across developments to ensure wheelchair users are afforded choice in their accommodation. However, the impact of lift failure, whether resulting from a power cut or mechanical fault, on the safety and welfare of disabled people who rely on lifts to access their homes should not be underestimated. It can also impact the ability to let M4(3) homes on upper floors.

3.129 By better matching provision to need, the approach should help optimise the use of land, since wheelchair user dwellings are larger on average than other dwellings, and it is more likely that they will be occupied by wheelchair users and other disabled people who need them.

3.130 Given London's predominance of higher-density and flatted development, and the proportion of Londoners experiencing social difficulties, improving the acoustics of new homes in London will help to meet the needs of neurodivergent Londoners, improving wellbeing and minimising health impacts. This will help to ensure that the Mayor meets the aims of the Public Sector Equality Duty.

[36] Such as a housing Occupational Therapists or access consultant accredited by the National Register of Access Consultants

[37] Such as a housing Occupational Therapists or access consultant accredited by the National Register of Access Consultants

HN10 Burial space

Policy aim: To plan pro-actively for the expansion, re-use and long-term provision of burial space to meet future demand.

Applies to: All burial space proposals

Locations: All, including Green Belt where applicable

Plan-making

A Plan-making authorities should plan pro-actively and collaboratively for the expansion, re-use, and long-term provision of burial space, recognising cultural and faith needs, by:

(1) referring to the latest evidence, identifying existing capacities relative to needs (including cross-boundary)

(2) applying a sequential approach to identifying new capacity, considering re-use and intensification within existing burial sites, other means of expanding such sites and then new sites within the existing urban area (whether inside or outside the borough) where compatible with environmental strategies and faith specific needs, before exploring Green Belt (preferably grey belt) options that are reasonably accessible to relevant communities, and

(3) securing sufficient and appropriate burial provision through site allocations or agreements with other boroughs.

Development management

B Development proposals for new burial provision, or the expansion of existing sites and associated facilities required, should:

(1) be supported in principle given the strategic need. This may include provision within one borough to meet the needs of faith groups from neighbouring boroughs experiencing burial space shortages

(2) integrate with proposals for local green infrastructure enhancement and strategic GI opportunity areas where appropriate, and demonstrating compatibility with other environmental strategies

(3) demonstrate that consideration has been given to future grave reuse and that this is reflected where appropriate in design and management strategies.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

3.131 The Audit of London Burial Provision should be regarded as up to date evidence for the boroughs covered by it. For those not covered by it, or for which there are data gaps, LPAs should produce equivalent evidence. This includes accounting for the needs of particular faith groups that require burials.

3.132 In identifying opportunities for additional provision, grave re-use should be considered[38], starting with graves known to be more than 100 years old. There may also be other opportunities for intensification and expansion of existing sites. Design for re-use may include providing for double or even triple depth burials where ground conditions allow. Provision for re-use may also be reflected in management practices such as lease length and transparency regarding its potential. Faith-specific considerations may also apply, for instance, ensuring that any re-use is only for persons of the same faith. It may be more difficult to provide for faith-specific needs (e.g. regarding orientation to Mecca; and re-use only of graves within the same faith in re-use and intensification situations).

3.133 In considering these options, compatibility with environmental strategies (particularly those relating to nature recovery, green infrastructure, publicly accessible green space and the management of surface-water flood risk and water quality) should be carefully assessed. Strategies for managing the historic environment may also be relevant. Proposals for new provision should also reflect these considerations and opportunities for green infrastructure enhancement.

3.134 It is therefore expected that grey-belt and Green Belt sites will be needed in many cases, in which case policy PV7 applies. Accessibility is here defined by distance and journey time, most commonly by road. However, where assessing alternative site options, differences in accessibility may be evident, and a choice of means of access within reasonable journey time will always be preferable.

Rationale

This policy reflects a number of key considerations:

3.135 The Audit of London Burial Provision establishes a strategic need for burial space. It sets out the uneven distribution of burial space, the pressures on capacity, and the challenges in making more space available. The policy addresses these issues in the context of making best use of land, setting out how boroughs should use their powers as burial authorities[39], plan-makers and LPAs.

3.136 The policy seeks to ensure that boroughs plan pro-actively and collaboratively for the expansion, reuse, and long-term provision of burial space, recognising cultural and faith needs; and address strategic land shortages by considering burial provision within the Green Belt and other areas where appropriate. In doing so it recognises that burial spaces can form part of London's green infrastructure and historic environment and that this presents opportunities not just constraints. It also supports independent proposals where these align with the approach.

[38] Section 74, of the 1972 Local Government Act provides the conditions in which human remains can be proactively disturbed to re-use and increase space. Additionally, the Local Authorities' Cemeteries Order 1977 provides the conditions for one or more burials in any single grave space and reclamation of abandoned graves (re-use) if rights are expired.

[39] Under the Local Government Act 1972 the London boroughs have the duty to provide and maintain cemeteries within and outside their areas, and in ensuring there is sufficient burial space for their borough requirements. The GLA is not a burial authority under this Act.

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

Reasoned justification for chapter 4

4.1 The London Growth Plan sets out the growth ambitions for London as a global city including increased productivity; inclusion; green growth; and increasing services exports. A range of business space and infrastructure is required to create the conditions necessary to meet these ambitions for London; this will involve growth, adaptation, innovation and improvements.[40]

4.2 The labour market projections suggest the largest growth employment sectors will continue to be in professional, scientific, technical and real estate activities and therefore London will continue to need prime office space that meets occupier demands in highly accessible locations. There is also identified demand for retail, other Class E and research and life sciences, and other 'frontier innovation' space. New non-residential floorspace will need to be flexible and adaptable to meet the variety of commercial space requirements across London.

4.3 While London has seen a decline in industrial space due to a range of factors, including the decline in manufacturing and the demand for housing, the evidence shows there is an increasing demand for industrial land. This reflects an increasing population, continued changes in the way we shop (with associated logistics requirements), and the need for infrastructure to support a growing economy. Given the limited supply of land to meet all our housing and economic needs, as well as the infrastructure to underpin this, the policy approach needs to balance the different demands; direct them to the most appropriate locations; and minimise adverse impacts.

4.4 London's wealth of cultural and sporting venues – and the experience economy more widely – contributes significantly to London's social and cultural value and identity as well as to the visitor economy. The importance of culture is specifically recognised nationally including through the City of Culture programme. Culture and the creative industries contribute around £50 billion to London's economy every year and account for one in seven jobs in the capital. The night-time economy also plays a crucial role in this. However, London's cultural venues and creative spaces face a range of threats (including the loss of premises to alternative uses such as housing and constraints on operation) and affordability concerns. It is important to retain these uses and provide new spaces and facilities where possible. It is also important to enable ongoing operation of existing facilities and manage impacts of new development, including through the application of agent of change policy and the effective interaction between licensing and planning policy regimes.

4.5 Business costs including rents are particularly high in London. Affordable workspace is needed to support new and emerging businesses and industries as well as other uses that contribute to the vibrancy of London as a global city of commerce and culture and as a tourist destination. Given the growth in availability of secondary commercial stock, this

[40] The NPPF states that planning should create the conditions in which businesses can invest, expand and adapt.

Plan has a new approach to enable off-site provision or payments in lieu.

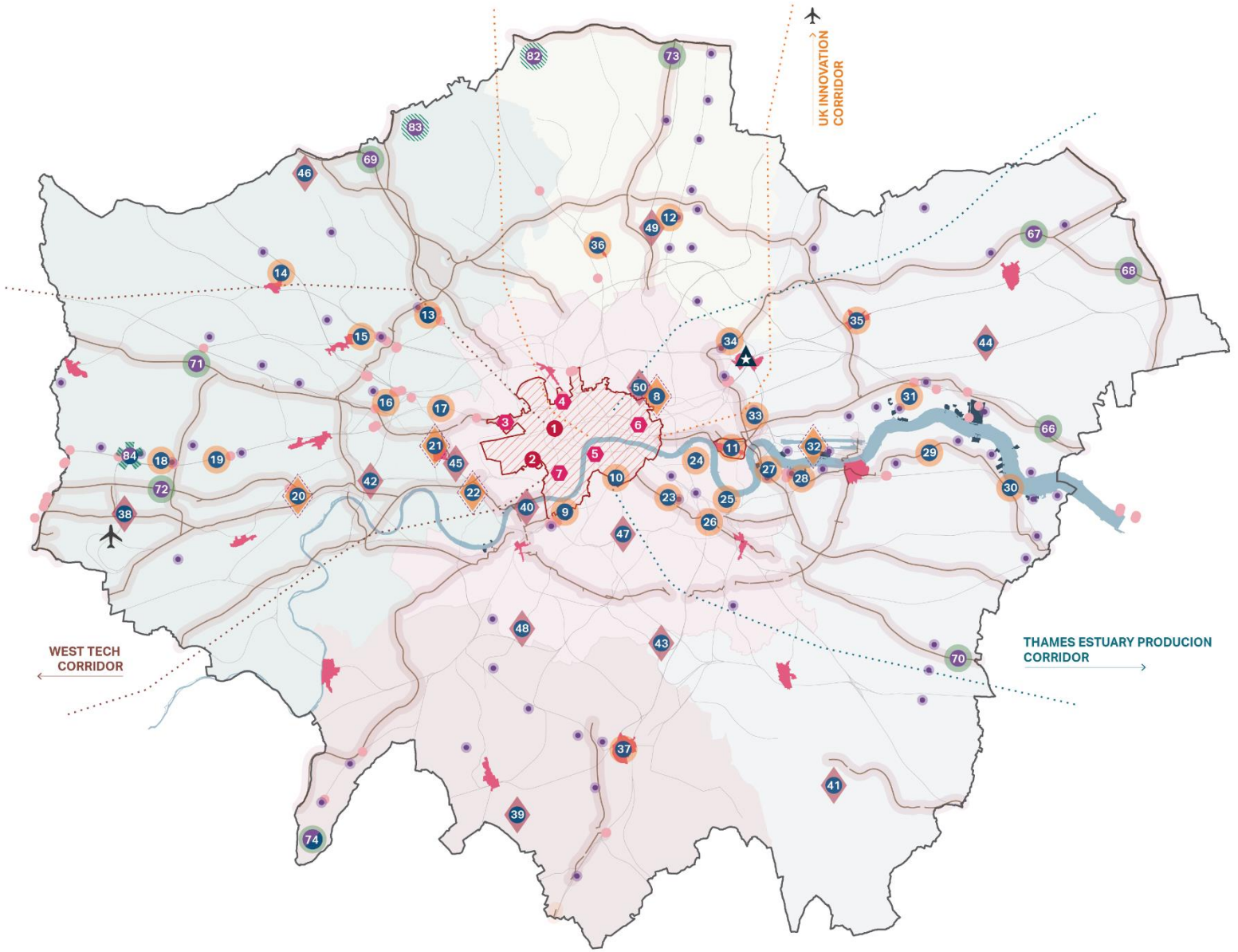
4.6 While London is the engine of the UK economy, the benefits of economic success are not shared evenly across the capital. This means that some Londoners find it harder to gain genuine access to work than others. For those in work, finding good-quality jobs that use their skills fully can also be an issue. At the same time, London is facing acute workforce shortages across the construction and built environment industries, which is a barrier to meeting London's growth needs. The Plan seeks to secure good quality employment opportunities for Londoners, including those who are out of work, under-employed or from under-represented groups in the labour market.

4.7 There are a number of infrastructure uses that are important to support London's continued economic success, but that currently have adverse environmental impacts such as aviation, data centres and logistics. Without proper planning and mitigation requirements, these can have disproportionate impacts. Conversely there is the opportunity to harness their potential while protecting our environment and serving our communities.

4.8 The Environment Strategy sets the objective to maximise local waste sites and ensure that London has sufficient infrastructure to manage all the waste it produces, with a view of becoming net self-sufficient. London is currently 70 per cent self-sufficient; as such, more work over the Plan period is required to achieve this objective. This needs to be done in the most sustainable way including through the proximity principle prioritising reuse, recycling and circular economy needs.

4.9 London also has a growing demand for aggregates, in particular to support construction and therefore the relevant boroughs need to safeguard the sources for these – both land won and marine/imported. This also requires a robust approach to protecting wharves to enable the long-term efficient transport of these materials as well as waste and other goods, making best use of the sustainable transport opportunity presented by the Thames. A precautionary approach to possible proposals for hydraulic fracturing ('fracking') is also considered necessary, until a clearer national position is in place.

4.10 The sub-key diagram illustrates the Growing London's Economy policies spatially where relevant, but should be read in conjunction with the key diagrams and the Infrastructure sub key diagram in chapter 2 and the Places sub-key diagram in chapter 6.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WEST TECH CORRIDOR
THAMES ESTUARY PRODUCION CORRIDOR

Figure 4.1:Economy sub key diagram

GLE1 Sufficient and appropriate employment space

Policy aim: To provide for the land use and floorspace needs of all sectors of the economy and support delivery of the London Growth Plan.

Applies to: All local plans, and development that includes or displaces employment floorspace

Locations: All

Plan-making

A Plan-making authorities should set out policies in local plans to meet the diverse land and floorspace requirements for all economic uses by providing for a range of suitable business space of different types, sizes and price-points having regard to the needs of SMEs, larger firms and third sector organisations, and informed by the London Growth Plan and London-wide and local assessments of supply and demand.

Development management

B Developments for Class E uses should be designed flexibly, wherever possible to accommodate a range of commercial, business and service uses and occupier sizes; and facilitate adaptation to future business and community needs and economic circumstances.

C Developments for light industrial uses should be designed to meet the needs of a range of occupiers with adequate floor-to-ceiling heights and corridor widths, load-bearing floors, goods lifts and access arrangements.

D Developments for life sciences laboratory space should incorporate necessary design features and access to utilities, with particular requirements for high-capacity power, water, ventilation, load-bearing floors, higher floor-to-ceiling heights, vibration absorption and high-speed digital connectivity.

E Planning conditions restricting changes in economic or social infrastructure uses may be used in circumstances where they are justified and necessary such as:

(1) to maintain a balance of uses appropriate to an area, or

(2) on sites where other uses in the same use class would not be appropriate, or

(3) to safeguard capacity for the intended uses such as social infrastructure, creative workspace or light industrial floorspace.

F Developments that result in the potential displacement of existing small and independent business uses should either re-provide such space in the development where feasible and appropriate in terms of its type, size and cost, including affordable workspace where this exists on site, and/or work with the borough to ensure that appropriate relocation options are available.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.11 The GLA's strategic evidence[41] identifies demand for offices, research and development, life sciences laboratories, retail, leisure, industrial uses, storage and distribution floorspace, and cultural infrastructure (including nightlife uses).

4.12 To ensure a sufficient and appropriate supply of employment space, local plan-making policies may need to be supported by targeted Article 4 Directions to remove commercial to residential permitted development rights, particularly in locations such as the CAZ, NIOD, town centres, high streets and industrial areas. Article 4 Directions should sit alongside a clear and positive route through planning permission for housing delivery in the Mixed CAZ (see PV2 Central Activities Zone (CAZ)) and the NIOD, and in town centres and high streets.

4.13 The design, type, and level of fit-out of commercial uses (including those in mixed-use development) should be fit-for-purpose, inclusive and adaptable, with flexible layouts with few columns or risers, be of a suitable depth to accommodate back-of-house functions. This is to support the long-term viability and adaptability of commercial, social spaces and high streets, ensuring their longevity and resilience to changing economic circumstances. The Mayor's Designing Space for Culture toolkit provides guidance to support the delivery of high-quality, inclusive and effective space to accommodate different types of creative and cultural workspace.

4.14 Planning Use Class E supports a flexible approach to commercial, business and service uses and LPAs should only limit this flexibility through planning conditions where there are sound planning reasons for doing so. Examples of where planning conditions could be justified and necessary to maintain a balance of uses appropriate to an area include restrictive conditions on new (Class E) light industrial or research and development located in a SIL or Locally Significant Industrial Site (LSIS). Conditions may also be appropriate to safeguard provision of health uses, indoor sport and recreation and creative workspace in other locations such as CAZ, town centres and high streets, where they may be vulnerable to loss to other commercial, business and service uses.

Rationale

This policy reflects a number of key considerations:

4.15 Planning has a key role to play in delivering the ambitions set out in the London Growth Plan, particularly by supporting employment generating development and growth sectors including financial, professional and business services and technology, Creative industries and technologies, International education, Frontier innovation including life sciences, and the experience economy.

GLE2 Supply of industrial land

Policy aim: To support economic growth by meeting the strategic needs of businesses, services and infrastructure uses in London that rely on industrial land.

[41] Arup and Nexus Planning: Supply and Demand for Economy and Infrastructure Uses (2026) (forthcoming); MedCity: Lab Showcase Report (2025)

Applies to: All local plans and development proposals for industrial use

Locations: All

Plan-making

A Plan-making authorities should plan positively in local plans to provide for and maintain sufficient industrial capacity to meet strategic needs in the most suitable locations with good freight transport access. These strategic needs include any identified additional need for sui generis uses that depend on industrial land, as well as a strategic benchmark for storage and distribution[42] demand within their Property Market Area (PMA), see Table 4.1: Storage and distribution demand benchmarks by PMA.[43]

B Plan-making authorities should establish a strategy to meet their needs, drawing on strategic and local evidence, and seeking to re-activate vacant industrial land and re-purpose any arising surplus land in commercial use. They should also collaborate and pool their respective capacities and plan to re-provide capacity in advance of any release elsewhere within their PMA (see PV5 Industrial land supporting housing growth).

C With reference to the Economy sub-key diagram and Annex G, plan-making authorities should review the boundaries of their existing industrial designations (Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS)). Boundary reviews involve both designating additional industrial land (see part D-E) and releasing currently designated industrial land in appropriate locations (see PV5 Industrial land supporting housing growth).

D Plan-making authorities should proactively designate new SIL and/or LSIS to help meet their strategic and local needs and to compensate for any release elsewhere in the PMA. This should involve considering whether there is undesignated industrial land in industrial use, which could be designated, in particular if the land is in existing storage and distribution use or particularly suitable for storage and distribution.

E Within the identified industrial BLGs only (see **Error! Reference source not found.**), plan-making authorities should progress strategic-scale release of Green Belt land to help meet their strategic needs (see Policy MBUL1 Spatial strategy and Policy PV7 Sustainable enhancement and development of the green belt). Released Green Belt for this purpose should be identified as future SIL.

Development management

F In SIL and LSIS, development for the following uses only should be supported:

(1) Class B2 uses

(2) Class B8 uses

(3) sui generis industrial uses such as waste, aggregates, utilities and sustainable transport infrastructure

[42] This benchmark excludes outdoor storage, self storage, transport depots and data centres.
[43] See the Economy sub-key diagram for PMAs

(4) Class Eg(ii) and Eg(iii)

G Proposals for industrial intensification (see Glossary) should be supported. Intensification is specifically encouraged in appropriate locations where there is:

(1) potential to make more efficient use of land and suitable yard space for servicing

(2) good long-term viability prospects

(3) good connectivity to strategic freight transport corridors

(4) acceptability of the required size and massing of buildings

(5) adequate distance from sensitive uses to avoid negative impacts, and

(6) existing stock in need of modernisation.

H Where intensification can only support class Eg(ii) or Eg(iii) uses, development proposals should demonstrate that this would free up industrial capacity to help meet identified strategic needs elsewhere.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.16 The local need for industrial capacity includes space requirements for industrial uses to serve residents and businesses, including those that contribute to locally significant sectors such as those identified in the London Growth Plan.

4.17 Additional need for different sui generis industrial uses can only be determined by the plan-making authority based on local circumstances and key sectors locally as well as strategic demand and opportunities to provide for a range of infrastructure uses. Engagement with infrastructure providers is important, as per policies MBUL4 and MBUL5. For example, land for public transport will be required as network capacity has to grow to meet need. Engagement and agreement with TfL is needed to ensure operations can be carried out effectively.

4.18 Land that benefits from the agglomeration of industrial uses, the potential for 24/7 operations and good connectivity to strategic freight transport corridors (including water and rail) is particularly suitable for industrial designation. Where such land is designated but currently vacant, is occupied by non-industrial uses or otherwise lacks suitable premises and supporting infrastructure, a site allocation may help positively support industrial use. Site allocations also represent a suitable mechanism to facilitate new designations (see policy parts D-E) and intensification opportunities (see policy parts G-H).

4.19 SIL and LSIS focus on accommodating uses that are dependent on industrial land due to the nature and impact of their activities on sensitive uses; the introduction of non-industrial uses in these areas is not supported. The introduction of non-industrial development in SIL and LSIS will be supported only if set out in an adopted or emerging (Regulation 19) Local Plan at the time of publication of this draft Plan and in agreement with the GLA as part of a coordinated masterplanning process. Data centres are covered in Policy GLE3 Data centres; this policy does not apply to them.

4.20 For Class Eg(ii) and Eg(iii) a mechanism to retain the industrial use over time would ensure they can be counted towards meeting industrial need. Potential mechanisms to help ensure that these uses remain in industrial use over time include planning conditions and design requirements that are necessary for industrial operations.

4.21 Local monitoring arrangements are needed to provide a transparent understanding of performance against identified needs and compensation for any release (see PV5 Industrial land supporting housing growth).

4.22 The benchmarks for additional storage and distribution demand in Table 4.1 include shorter-term figures as the basis for monitoring; while plan-making authorities should positively plan for the longer-term figures by ensuring suitable additional capacity in identified broad locations is at least safeguarded as per MBUL1.

Table 4.1: Storage and distribution demand benchmarks by PMA

PMA	**000 sqm floorspace 2024-36**	**000 sqm floorspace 2024-50**	**Hectare land 2024-36**	**Hectare land 2024-50**
Central Services Area	320	760	70	140
Thames Gateway	330	770	70	140
Lea Valley	110	200	20	40
Park Royal / A40 / Heathrow	350	750	80	140
Wandle Valley	150	330	30	60
Total	1260	2810	270	520

4.23 The benchmarks are based on evidence (Economic Uses Demand and Supply Study),[44] which also includes an indicative borough breakdown. The demand benchmarks assume that increasingly ambitious efficiency savings are realised through, for example operational improvements such as automation, layout optimisation and digital inventory management; increasing floor heights; and industrial intensification in suitable locations (see Part G). This means that proportionately less land will be required for storage and distribution over time, and this can be promoted by plan-making authorities. An Industrial Collaboration Working Group for plan-making authorities will facilitate and coordinate the meeting of needs on a PMA basis, including additional needs that are likely to arise due to industrial release (see PV5 Industrial land supporting housing growth).

4.24 Given the relatively high benchmark for the Central Services Area (CSA), the need to service the international hospitality and leisure sectors and the limited supply of available land for industrial use, plan-making authorities may seek to work with other PMAs to accommodate a proportion of their need. Any such alternative provision should minimise

[44] See London Plan Evidence | London City Hall

freight vehicle distance to/from the new industrial location, in particular for activities supporting the servicing of the CAZ. Within the CSA, space to accommodate urban logistics hubs is particularly important.

4.25 For land in SIL or LSIS that is currently occupied by non-industrial uses, plan-making authorities could consider:

- release from industrial designation, where the criteria in Policy PV5 Industrial land supporting housing growth are met
- retention as SIL or LSIS and repurposing for industrial provision.

4.26 Individual development proposals for industrial uses in the Green Belt within and outside broad locations for growth are covered in PV7 Sustainable enhancement and development of the Green Belt.

Rationale

This policy reflects a number of key considerations:

4.27 London lost 18 per cent of its industrial land between 2001 and 2020. As a modern economy, it cannot function without planning for sufficient land to service its residents, businesses and visitors. Many sectors require close and timely access to their supply chain, access to storage for goods and materials and access to their customers. London is too large to be serviced sustainably solely from its periphery or from outside its boundaries.

4.28 There is a range of strategic needs for businesses, services and infrastructure uses in London that rely on industrial land due to the nature and impact of their activities on sensitive uses. SIL and LSIS focus on accommodating such uses. The construction sector, and strategic infrastructure uses such as waste management and public transport in particular are vital to effectively support London's growth.

4.29 The character of industrial areas varies across London. Industrial spaces are important to keep London innovating by supporting e-commerce, key environmental services, technology start-ups and many of London's creative talents.

GLE3 Data centres

Policy aim: To set strategic criteria in order to meet the need for data centres in suitable locations in London while mitigating disproportionate impacts and delivering benefits for the local community and environment

Applies to: Development proposals for data centres

Locations: All

Plan making

A Plan-making authorities should pro-actively identify suitable locations in local plans for

data centres to meet need, taking into account the following locational criteria:

(1) Availability of current and projected electricity network and water supply capacity, recognising the requirements to meet local housing, employment and other infrastructure needs

(2) Opportunities for clustering to support resilience and co-location benefits

(3) Local heat recovery opportunities

(4) Availability of land without compromising the supply to meet local housing needs as well as employment and infrastructure needs that depend on freight transport infrastructure and

(5) Where relevant, compliance with Habitats Regulations considering potential air quality impacts from back-up generators on Epping Forest Special Area of Conservation (SAC).

B If no suitable locations can be identified within the boundaries of the plan-making authority, it should:

(1) first, collaborate with neighbouring authorities within and outside London

(2) second, seek to identify suitable locations in the grey belt or on the edge of BLGs in the Green Belt, taking into account the criteria in part A.

C Plan-making authorities should set out, as part of the process of identifying suitable locations, opportunities for data centres to contribute to relevant local benefits. They should also set out appropriate levels of CIL to help mitigate adverse impacts on, and deliver benefits to, affected communities.

Development management

D Development proposals for data centres in suitable locations should be supported in principle.

E Development proposals for data centres in other locations should:

(1) justify the proposed development location and demonstrate mitigation of adverse impacts including on infrastructure capacity needed to support growth in the area

(2) demonstrate how adverse impacts of electricity connections, in particular congestion and disruption from street works across multiple plan-making authorities will be minimised and mitigated, and

(3) use grey belt sites or edge of BLGs in the Green Belt only if it can be demonstrated that no suitable brownfield sites are available.

F All development proposals for data centres should be as clean and sustainable as possible and demonstrate the use of:

(1) coordinated heat recovery infrastructure that is informed by a waste heat utilisation plan

(2) coordinated electricity and water efficiency measures including innovative cooling technologies and

(3) where feasible, electricity generation on-site or nearby from renewable energy sources.

G The approach to back-up power should demonstrate with reference to the latest best practice that:

(1) testing is minimised during construction and operation of the data centre, taking into account the cumulative impact of other data centres nearby, with appropriate limits secured as part of any planning permission

(2) the lowest-emission engines and fuels available are used to minimise overall air quality and carbon impacts, with abatement of emissions applying Best Available Techniques and achieving any relevant emissions standards and

(3) site location, design and testing hours minimise human exposure.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.30 The types and scale of data centres are evolving rapidly and so are their impacts. Data centre operators tend to benefit from clustering, where existing data centres are already established. There is significant uncertainty over the scale of demand for data centres, but London's Data Centre Future Growth Forecasts and Strategic Insights study[45] provides relevant evidence for plan-making authorities to consider, alongside an expected National Policy Statement on data centres and a Data Centre Strategy, as well as up-to-date information from the NESO, the National Grid and the Distribution Network Operators.

4.31 Plan-making authorities will monitor the scale and cumulative impacts of multiple data centre developments within suitable locations and keep re-assessing them based on the criteria set out in Part A.

4.32 LAEPs set out the decarbonisation pathway for an area, including current and projected availability of electricity and any increases in distribution capacity, to meet future need. They also show local heat demand, locations of existing local heat networks and any opportunities to develop new networks.

4.33 Innovative approaches to cooling are evolving and can help to improve Power or Water Usage Effectiveness ratios.

4.34 The latest best practice relating to generator testing and emissions reduction and mitigation (see Part G) refers to guidance produced by statutory and professional bodies, including the GLA and the Environment Agency. While manufacturer requirements may provide a baseline for safe operation, testing protocols should be restricted to the minimum extent necessary to ensure safe, reliable, and consistent operation. This includes testing the smallest practicable number of engines at any one time. Innovation in relation to digital monitoring and predictive maintenance is rapidly evolving, allowing for

[45] London's Data Centre Future Growth Forecasts and Strategic Insights | London City Hall

reduced testing times and frequencies, and the emergence of 'no-activation' health checks. It is expected that this will be reflected in such guidance in due course. In consideration of human exposure and cumulative impacts, it is recommended that any required back-up generator testing avoids periods of moderate or higher pollution episodes (defined by London's air quality monitoring network).

4.35 Environment Agency advice states that screening for impacts of emissions on habitats of international significance should consider a 10km zone of influence around the stack[46]. However, local air quality evidence base work may refine this to particular areas of concern as per Policy GHR10. Plan-making authorities will need to satisfy themselves that any data centre location identified within such an area will be compliant with Habitat Regulations. This approach will not be relevant if alternative back up power sources without such emissions impacts become the norm.

4.36 Data centres are not included in the definition of industrial land for the purpose of this Plan. If a data centre proposal comes forward on designated industrial land before the plan-making authority has identified suitable locations within its Local Plan, the criteria for suitable locations should be applied in the interim.

4.37 As set out by policy PV7, when considering data centres proposals within the Green Belt, grey belt land or the edge of BLGs in the Green Belt (see Part B(2) above) may be prioritised where the other requirements of this policy are met. This differs from the approach to industrial uses, such as storage and distribution, where increased operational impacts such as HGV trip generation mean that a more targeted, strategic focus within identified Green Belt industrial BLGs is required.

4.38 Appropriate benefits for local communities will relate to wider policy objectives, including potentially suitable ancillary uses and affordable workspace, access to affordable computing, support for local skills development, targeted environmental, transport or other infrastructure improvements. They will depend on local circumstances - but would help to mitigate impacts on affected communities and help to ensure that data centres play a positive role in local areas.

4.39 In urban design terms, benefits could be achieved from flexibility to enable future upgrades or reuse, where possible, and from mitigating the scale/massing of larger data centres to facilitate integration into their surroundings without compromising essential security requirements.

4.40 Outside of suitable locations, development proposals should demonstrate the need, including for example proximity to (latency requirements of) specific end-users, and suitability in the specific location. This may need to be supported by infrastructure investment, for example the provision of a necessary substation or fibre connection.

Rationale

This policy reflects a number of key considerations:

4.41 London is home to Europe's largest data centre cluster. They support the growth of important data-driven sectors and AI. But this growth will only deliver real benefits for London if the infrastructure that enables it is clean, efficient and aligned with the Mayor's climate goals. Therefore support for the growth of data centres in London will

[46] Air emissions risk assessment for your environmental permit - GOV.UK

focus on clean, green and efficient facilities that embrace innovation and benefit Londoners.

4.42 Epping Forest SAC is known to experience adverse impacts of nitrate and ammonia deposition. Mitigations and modelling are focused on impacts derived from vehicular combustion engines and traffic congestion. They do not account for back-up generators and their testing regimes, therefore this policy is intended to minimise any such impacts

GLE4 Night-time economy

Policy aim: To protect and promote London's thriving 24-hour economy and public houses, and support the night-time workforce, enabling the efficient operation of night-time businesses and sectors such as food and beverage, culture, hospitality, nightlife, retailing, healthcare and logistics.

Applies to: Night-time and nightlife uses.

Locations: Town centres, high streets, CAZ, cultural clusters, areas with industrial uses and other areas of strategic night-time activity.

Plan-making

A Plan-making authorities should plan for growth in the night-time economy and nightlife in ways that:

(1) boost economic activity in hospitality, culture, nightlife and events and support the vibrancy of town centres, high streets and the CAZ

(2) positively impact London's reputation as a destination for tourism, business, investment and hosting events including major cultural and sporting events

(3) support the 24-hour operation of SILs and LSIS

(4) seek to protect and future-proof night-time areas from sensitive land uses and enable increased housing where appropriate

(5) support an integrated approach through proactive coordination and engagement with licensing, transport, out-of-hours servicing and deliveries, community safety and security, and environmental and cleansing services

(6) protect public houses where they have a heritage, economic, social or cultural value to local communities, or where they contribute to wider policy objectives for CAZ, town centres and night-time economy areas.

Development management

B Development proposals should:

(1) support a diverse mix of night-time uses, including creative and community activities, applying the Agent of Change principle as required for their protection

(2) provide safe, inclusive, and accessible environments at night, designed for all, with

particular consideration given to race, sex, age, sexual orientation and disability

(3) support the provision of facilities for night workers including late-night shops, cafes, toilets and places of shelter

(4) retain existing public houses where they have a heritage, economic, social or cultural value to local communities

(5) retain public house use, as part of redevelopment of the building, where this would support placemaking and the existing public house does not have a heritage, economic, social or cultural value to local communities

(6) accept the loss of a public house where there is no realistic prospect of the building being used as a public house in the foreseeable future supported by compelling marketing evidence.

C Proposals for new public houses should be supported where they contribute positively to the vibrancy of town centres, CAZ and nightlife clusters.

D Proposals for sensitive uses should be designed from the outset to minimise and mitigate any identified or potential nuisances generated by nearby existing and permitted night-time uses, in line with the agent of change principle. This means that new development and particularly any sensitive uses should mitigate significant adverse impacts through separation, layout/orientation, screening, ventilation, filtration and acoustic design measures to ensure that night-time and 'nuisance' generating operations are not compromised.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.43 London's strategic town centres contain night-time economic activities that function at different scales and have different catchments. They have been classified, as set out in Annex B Town centre network, Table B1, into four broad categories:

NT1 – Centres of international or national significance

NT2 – Centres of regional or sub-regional significance

NT3 – Centres with more than local significance

NT4 – Centres with local significance

4.44 The Agent of Change principle protects existing and permitted activities from new sensitive development proposals in their vicinity. A technical assessment should detail the potential nuisance generated by relevant nearby night-time activities including on their access routes and set out design measures taken to avoid or minimise their impacts to acceptable levels for neighbours. This should also demonstrate the effectiveness of mitigations, which should be secured through planning conditions. Planning and licensing are separate but complementary regimes. Applicants should engage early with both services where proposals may affect existing pubs, music venues, cultural spaces, events or nearby noise sensitive development.

4.45 Policies should ensure inclusion, safety, and representation in the broader planning of our

city for hours of darkness.

4.46 The loss of public houses; (both the specific building/establishment itself and the use) can have a detrimental effect on an area, particularly when they serve a social and cultural function. Where there is a risk of such detrimental impacts through the loss of valued public houses and their associated uses (such as restaurants and theatres), boroughs may also wish to consider the use of other tools such as nominations to designate as an Asset of Community Value (ACV) which can be a material planning consideration.

Rationale

This policy reflects a number of key considerations:

4.47 Night-time uses are a key part of London's economic and social functioning, and occur between 6pm and 6am. The night-time economy consists of nightlife activities and spaces for Londoners to participate in, as well as the wider range of economic operations and services that support the city's role as a 24-hour city.

4.48 There will be housing growth across London in line with MBUL1. Planning for the growth in night-time and nightlife uses should recognise this context, and seek proportionate measures that would future-proof these uses and centres of night-time activity from sensitive uses.

4.49 The night-time economy and nightlife need to be protected and planned with due regard to equality considerations. Many Londoners — particularly women, LGBTQ+ people, disabled people, and night workers — experience barriers to accessing and participating in the city at night.

4.50 Given the broad nature of the national Agent of Change principle, this policy seeks to improve certainty and ensure a consistent approach across London to address challenges that existing and permitted night-time uses or clusters of those uses are facing in the context of the high/increasing development densities in many parts of London.

GLE5 Culture and creative industries

Policy aim: To promote London's rich cultural offer through the enhancement and protection of its diverse range of cultural facilities and creative industries.

Applies to: Cultural and Creative facilities and development proposals for them or which impact on them

Locations: All locations including cultural facilities and creative industries

Plan-making

A Plan-making authorities should:

(1) protect existing and promote new or enhanced locally distinct and strategic clusters of cultural uses and facilities in support of regeneration and town centre renewal

(2) consider requiring the replacement of a facility or use, where a development proposal

leads to the unavoidable loss of a cultural space

(3) protect Creative Enterprise Zones (CEZ) designations in Local Plans and include policies that support zone objectives

(4) protect and manage new and existing cultural production and creative workspace in CEZs, providing flexibility for changing business needs, including affordable workspace (see GLE7 Affordable workspace) and related ancillary facilities.

Development management

B Development proposals should:

(1) protect existing cultural facilities and creative industries (consumption and production)

(2) support the development of new cultural facilities for consumption and production uses, both standalone proposals and as part of wider development proposals.

C Proposals for major development of cultural consumption uses should be supported in the CAZ and town centres and places with good public transport connectivity.

D Where there are existing cultural facilities, development should provide/re-provide at least an equivalent amount of cultural space with similar affordability for end users in line with GLE7 Affordable workspace.

E 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 should be supported. This may also be appropriate in industrial areas, where the safety of visitors is addressed and if it can be ensured that industrial activities including any 24-hour operations are not compromised.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.51 Boroughs are encouraged to assess and evaluate the supply and demand of cultural and creative uses and facilities making use of the Mayor's Cultural Infrastructure Map and consider how and where cultural consumption and production spaces need to be promoted and protected including through site allocations to meet demand. This should take into account demographic changes, the potential to support placemaking and integration with wider networks.

4.52 Boroughs will be responsible for defining CEZs in their Local Plans and developing local policies to address and maintain the objectives of the Zone. Designation of CEZs will support the provision of suitable and affordable creative workspaces and associated users.

4.53 The protection of cultural uses and facilities benefits significantly from the application of the national Agent of Change principle, given that these may often by their nature generate noise and other impacts. See

4.54 GLE4 Night-time economy for further details.

4.55 Where there is a risk of detrimental impacts through the loss of valued cultural facilities and uses, boroughs may also wish to consider the use of other tools such as nominations to designate such facilities as an Asset of Community Value which can be a material planning consideration.

4.56 In the replacement of cultural facilities, boroughs are encouraged to consider the importance of continuity of use, right of first refusal for the existing operator, the reprovision of appropriate space for the user group and that the space would be financially viable and sustainable for the operator to ensure that the cultural offer is not lost during redevelopment or unable to be realised post-development.

4.57 An Equalities Impact Assessment should be undertaken if the development proposal would lead to impacts on protected characteristics groups, and this should inform the reprovision of space. The Mayor's Designing Space for Culture (2022) guidance should be considered to ensure that cultural spaces are designed fit for purpose, and the Mayor's Securing Cultural Infrastructure and Workplace[47] planning practice note should be used to help secure these provisions.

Rationale

This policy reflects a number of key considerations:

4.58 Culture includes a range of uses and activities such as music and performance venues, visual arts, fashion, film, design, crafts and making, cinemas and museums. Culture, cultural venues and creative industries play a hugely important role in the economy and society – and nowhere more so than London. London's rich cultural offer delivers significant economic and social benefits for London and its diverse communities.

4.59 However, London's cultural venues and creative spaces face a range of threats, including the loss of premises to alternative uses and affordability. Finding new premises can be difficult due to the availability of appropriate space at an affordable price. The loss of cultural spaces can have a detrimental effect not just on an area but also more widely – they often form part of a locally or strategically important eco-system as well as serving a local community function.

GLE6 Visitor infrastructure

Policy aim: To strengthen London's role as a world-leading visitor destination and spread economic and regeneration benefits of tourism.

Applies to: Development proposals which involve enhancement, extension and inclusive access of London's visitor economy including its attractions, visitor accommodation and other supporting infrastructure.

Locations: All

Plan making

A Local plans should promote sustainability and inclusive access of London's visitor economy during the day and night, having regard to the needs of business and leisure

[47] Securing cultural infrastructure and workspace | London City Hall

visitors

B Local plans should promote and support development associated with new and existing visitor attractions, and promote enhancements to legibility, visitor experience and management, the historic environment and other supporting infrastructure including serviced accommodation, the public realm, toilet facilities and access by public transport, walking and cycling.

Development management

C Development of serviced visitor accommodation should be supported in the CAZ, town centres and high streets. Elsewhere in London, serviced visitor accommodation development should only be supported in locations that are well-connected by public transport and in line with the national sequential test for town centre uses.

D The intensification of the provision of serviced visitor accommodation should be supported in locations that are well-connected by public transport, and where it would not lead to negative impacts on housing supply, strategic capacity for employment uses or local amenity.

E Development proposals for serviced visitor accommodation should ensure sufficient choice for people who require an accessible bedroom and provide either:

(1) 10 per cent of new bedrooms to be wheelchair-accessible

(2) 15 per cent of new bedrooms to be accessible rooms.

F Development proposals for camping and caravan sites should be supported in appropriate locations having regard to strategic and local policy designations.

G Development proposals for short-term let visitor accommodation (which exceed national policy permitted time limits) should be resisted where they have a negative impact on the housing stock, local housing need and/or local amenity.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.60 A positive approach should be taken to supporting new serviced visitor accommodation in sustainable locations including the CAZ, town centres, high streets and other locations that are well-connected by public transport. It is recognised however, that in some localised instances, there can be tensions with other important land use objectives including housing supply and capacity for other employment uses. When considering whether capacity for other uses could be compromised by new serviced visitor accommodation, regard should be given to evidence in strategic and local assessments of demand and supply, local market conditions and development monitoring.

4.61 Serviced accommodation developments should include, as a minimum, accessible and inclusive design measures in line with Approved Document M: Access to and use of buildings. To implement Part E of London Plan policy, wheelchair-accessible rooms should be designed in accordance with Figure 52 incorporating either Figure 30 or 33 of

British Standard and BS 8300-2:2018 Design of an accessible and inclusive built environment Buildings Code of practice. Accessible rooms should be designed in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018.

Rationale

This policy reflects a number of key considerations:

4.62 London is a world-leading visitor destination, and it is important to strengthen this role through enhancements to its attractions, visitor accommodation and other supporting infrastructure whilst spreading the economic and regeneration benefits of tourism to sustainable locations across the city in line with the London Growth Plan.

4.63 Research has shown that there is need for accessible hotel bedrooms to meet the needs of visitors with accessibility requirements. The provision of accessible transport, public realm, and sporting and cultural venues needs to be complemented by the availability of accessible serviced accommodation to ensure that all visitors can stay in London and experience its visitor offer.

GLE7 Affordable workspace

Policy aim: To provide workspace for specific social, cultural, place-making or economic development purposes that is affordable for end-users.

Applies to: Developments including offices, research and development and/or light industrial uses (Use Class E(g)), data centres and B8 storage or distribution uses

Locations: As defined in Local Plans and existing affordable workspace

Plan-making

A Plan-making authorities should include policies to support the delivery of affordable workspace, triggered by applications for new office, research and development or light industrial uses (Class E(g)), data centres and/or B8 storage or distribution uses where justified by strategic and local evidence of need and an assessment of viability.

B Affordable workspace delivery should support specific social, cultural, place-making or economic purposes such as:

(1) sectors that have cultural value including cultural production space (such as creative and artists' workspace, rehearsal and recording space) and cultural consumption space

(2) specific uses (such as hospitality, independent food and beverage uses) that contribute towards the vitality and wider ecosystem of economic activity in the CAZ and town centres

(3) for disadvantaged or under-represented groups in the labour market in any sector

(4) sectors with social value functions such as charities, voluntary and community organisations or social enterprises

(5) educational outcomes through connections to schools, colleges or higher education

(6) start-ups and early-stage businesses or regeneration.

C Local Plans should set out:

(1) the locations where the affordable workspace policy applies

(2) the scale of office, research and development and/or light industrial use (Class E(g)), data centre and B8 storage or distribution floorspace that would trigger a requirement for affordable workspace provision

(3) the range of uses that can be delivered as affordable workspace including creative workspace/ light industrial uses, offices, research and development uses (Class E(g)), other Class E commercial, business and service uses (including independent food and drink, retail, health and creches), community uses (Class F1/F2) and/or cultural-related sui generis employment uses, having regard to local evidence of need and the social, cultural or economic development purposes set out in Part B above

(4) the amount of affordable workspace to be provided (quantum or percentage of proposed office, research and development and/or light industrial use (Class E(g)), data centre and B8 storage or distribution floorspace)

(5) the expected average discount to prevailing market rents

(6) the length of time for the affordable workspace provision, and

(7) circumstances where off-site provision or payments in lieu is likely to be supported.

Development management

D Affordable workspace can be provided on-site, or in an off-site location, particularly where it is not practical or feasible to deliver on-site or economies of scale or greater levels of discount and duration of provision could be achieved through alternative means and locations. In such cases, off-site provision and/or a financial contribution to a local authority affordable workspace fund (supported by a local authority affordable workspace strategy) should be made.

E Where there is existing affordable workspace on-site (or has been since 1 December 2017), proposed development should re-provide at least an equivalent amount of affordable workspace (with the same or enhanced affordability for end-users), unless the existing affordable workspace has been provided on a temporary or meanwhile basis pending the redevelopment of the site.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.64 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. Plan-making authorities are encouraged to supplement their local plan policies, where appropriate, with a local affordable workspace strategy setting out more detailed matters to support implementation. Where permission is sought for flexible Class E development, decision-makers should apply the policy if the physical configuration and/or intended use of the space is expected to include Class E(g) uses.

4.65 When considering need, affordability and the appropriate average discount on rent in local plan policies and at scheme level, relevant factors may include the location; the availability and take-up of existing affordable workspace and other lower-cost secondary business space in the general vicinity; the type and quality of the affordable space; the intended provider; and end-users. Other factors that affect affordability for end-users, include service charges, fit-out costs, lease and rent structures and business rates. Flexibility for variable percentage levels of floorspace and variable percentage levels of rental discount should be supported where this addresses the needs of particular end-users and locations.

4.66 Off-site provision and payments in lieu may be particularly suitable for data centre and B8 storage or distribution development and to secure greater benefits such as affordable workspace contributions from new Class Eg(i) office development in prime locations in the CAZ (to be determined locally) or to support communal off-site affordable workspace hubs for example, including in town centres, Strategic Economic Clusters and CEZs (except those in Strategic Industrial Locations). On-site provision can help to sustain a mix of business, leisure or cultural uses which contribute to the character or function of an area including, for example, affordable independent food and beverage uses on the ground floor or office buildings to support active frontages in the CAZ. For research & development uses, on-site provision would typically be preferable to support shared use of facilities.

4.67 Affordable workspace should be secured through a planning obligation in perpetuity (or, where this is not feasible or viable, for a period of at least 15 years) and should include mechanisms to ensure its timely delivery. Flexibility on the amount of affordable workspace as a percentage of total proposed Class E(g), data centre and/or B8 storage or distribution use may be appropriate where this delivers greater benefits in terms of higher rates of discount on rent and/or a longer period of time for the affordable workspace provision.

4.68 A scheme-level affordable workspace strategy and management plan can set out how the affordable workspace will be delivered, configured (in relation to the open market space if on-site), fitted out for occupation, marketed, managed and monitored. Affordable workspace strategies and management plans should make clear the intended social, cultural or economic development purpose of the space, its contribution to wider social value and the intended beneficiaries or target groups.

4.69 Applicants are encouraged to engage with workspace providers at an early stage in the planning process to ensure that the space is configured, fitted out and managed efficiently. Arrangements for engaging a provider, how the space will be owned or leased and the process for review, changes in terms, disposal or termination, should be agreed with the local plan-making authority. 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 of this policy over the affordable workspace term. The Mayor's Securing Cultural Infrastructure and Workspace[48] planning practice note provides guidance to help secure these provisions.

4.70 Where a site is to be used for temporary affordable workspace, this will generally be more appropriately secured through a temporary planning permission and must not prevent sites from being brought forward for development in a timely fashion. Parameters for any temporary or meanwhile use, particularly in relation to length of time for the temporary

[48] Securing cultural infrastructure and workspace | London City Hall

affordable workspace provision and associated obligations, should be established from the outset and agreed by all parties.

Rationale

This policy reflects a number of key considerations:

4.71 The provision of workspace across London that is affordable for end-users for specific social, cultural, place-making or economic development purposes plays a key role in supporting a more inclusive economy. Policies to support its delivery across a range of uses are important to support the London Growth Plan ambitions and provide opportunities for Londoners to start-up and run a business.

GLE8 Access to employment and skills

Policy aim: To secure good quality employment and training opportunities in major developments for Londoners, including those who are out of work, under-employed or from under-represented groups in the labour market.

Applies to: Major development

Locations: All

Development management

A Major development proposals (or locally determined development thresholds in local plans) should support Londoners into good quality-employment, apprenticeships, and other skills development and training opportunities in the construction phase and in the completed final use (for schemes containing employment uses).

B These opportunities should be secured through planning obligations and implemented in ways that:

(1) ensure the greatest possible level of take-up by Londoners of the training, apprenticeship and employment opportunities create,

(2) provide opportunities for Londoners who are out of work or under-employed and increase the proportion of under-represented groups in the construction industry workforce and other relevant sectors, and

(3) enable Londoners undertaking training to complete their training and apprenticeships, including across borough boundaries.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.72 Employers associated with new development are encouraged to work towards and

achieve the objectives of the Mayor's Good Work Standard[49].

4.73 Planning obligations should be used to secure these arrangements and include, where appropriate, financial contributions towards local employment, skills, apprenticeship and training initiatives.

4.74 Employment and training targets included in planning obligations should be based on the number of new employment opportunities (measured on a full-time equivalent basis, in the construction and completed-use phases of development) and apprenticeship and training starts and completions. Take-up of employment and training by London's out of work, under-employed and under-represented communities in the workforce in relevant sectors appropriate to the development should also be reflected in targets and monitoring. Evidence related to under-represented groups in the labour market can be sourced from the Inclusive Talent Strategy (ITS) and Get London Working Plan[50] evidence base.

4.75 Reciprocal arrangements between local authorities are encouraged to open up opportunities, including those created via planning obligations, to residents from adjacent boroughs and across London to enable training to be completed and necessary experience for qualifications to be gained across multiple development sites.

Rationale

This policy reflects a number of key considerations:

4.76 As set out in the London Growth Plan[51] and the ITS[52], skills are a key driver of growth and opportunity in London. However, the benefits of economic success are not shared evenly across the capital and some Londoners find it harder to gain genuine access to work than others. The difference in the proportions of people in employment between female and male Londoners is eight percentage points. The difference between disabled and non-disabled Londoners is 21 percentage points and the difference between White Londoners and Black, Asian and minority ethnic Londoners combined is 11 percentage points.

4.77 Good-quality employment is promoted through the Mayor's Good Work Standard[53]. New developments provide employment opportunities for Londoners both during construction and once completed.

GLE9 Aviation

Policy aim: To ensure London's aviation sector supports sustainable and equitable economic growth while fully addressing its environmental and health impacts.

Applies to: Aviation-related developments and advanced air mobility (AAM)

Locations: All locations with existing and potential aviation activity

[49] The Good Work Standard (GWS) | London City Hall
[50] Evidence base and Executive summary for the Get London Working Plan and the Inclusive Talent Strategy
[51] London Growth Plan | London City Hall
[52] Inclusive Talent Strategy | London City Hall
[53] The Good Work Standard (GWS) | London City Hall

Development management

A London's six main airports – as a single aviation system – should make the best use of existing capacity to ensure sustainable economic growth and jobs in local communities, supported by enhanced surface access by public transport, walking and cycling for passengers, staff and freight, combined with measures to discourage car use.

B Proposals for expansion at Heathrow and other airports should be refused unless no unacceptable environmental, transport, and congestion impacts are demonstrated.

C Proposals for expansion at Heathrow should be subject to commitment to contribution, provision, and/or improvement of sustainable surface access as identified in MBUL1 Spatial Strategy, the key diagram and Annex D.

D New heliports should be refused, except for the exclusive use of emergency services. Any significant shift in the mix of operations at other airports should also be refused.

E Aviation-related proposals that result in a change in airport operations or air traffic movements should be assessed against the policies of this Plan and should:

(4) assess and fully address their environmental and health impacts

(5) fairly share the benefits with local and affected communities

(6) contribute towards sustainable surface access, demonstrating that any additional trips will be made by public transport, walking and cycling, and that transport networks can accommodate the additional demand alongside forecast background growth, and

(7) engage with local communities and other stakeholders to consider all impacts and their mitigation.

F Proposals for AAM, which include drones and electric vertical take-off and landing (eVTOL) vehicles and their associated ground infrastructure (such as droneports), should consider safety, security, social and economic value, equity, accessibility, opportunity cost of land use, implications for the environment and public health – including noise, privacy, and visual disturbance – and support for sustainable and active travel.

G AAM proposals should include assessments of all the principles set out in Part F as well as the air and surface trips generated or substituted by the site. The spatial distribution and cumulative impacts of AAM sites should also be assessed.

H AAM providers should monitor and share data on their operations and associated impacts and mitigations with relevant authorities including Transport for London.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.78 The London Plan is important and relevant to the determination of an application for development consent alongside the NPPF and relevant local plan policies, with the Airports National Policy Statement (ANPS) as the primary decision-making framework.

4.79 New heliports (except for emergency services) should be restricted, as should the shift in the mix of operations at other airports (such as the introduction of scheduled flights at airports not generally offering such flights) so as not to allow proliferation of aviation activity that does not contribute to strategic and sustainable economic growth.

4.80 Future regulatory and technology improvements have the potential to reduce an airport's environmental footprint and can allow for more flights without any increase in environmental impacts. These and any other benefits from the aviation sector should be fairly shared with communities.

4.81 AAM is an emerging technology and understanding of its operations and implications will increase over time. The principles set out in policy provide an initial framework for considering any AAM-related proposals to minimise harm and maximise benefits.

4.82 Until any future legislation, AAM proposals can be considered sui-generis use class, and assessed on a case-by-case basis through the policy and any future guidance.

Rationale

This policy reflects a number of key considerations:

4.83 London's six main airports (Heathrow, Gatwick, Stansted, Luton, City and Southend) play a vital role in supporting London as a global city and engine for economic growth. Heathrow is classified as a strategic economic cluster in this Plan.

4.84 However, there can be significant environmental and health impacts associated with aviation from air pollution (including ultrafine particles); noise (both averaged over a period and from individual events); and greenhouse gas emissions (from flights and airport ground operations, and trips to and from the airport). The policies require that these environmental and health impacts should be fully assessed and effectively addressed.

4.85 Any expansion or increase in operations will also generate increased passenger, staff and/or freight traffic, which can lead to congestion and public transport crowding. As such, it is essential to improve public transport connectivity in order to reduce highway trips.

GLE10 Safeguarded wharves

Policy aim: To ensure that London has adequate and appropriate wharf capacity to meet the city's needs for more than 11 million tonnes (mt) of waterborne freight handling capacity up to 2050.

Applies to: Proposals for changes of use of safeguarded wharves to non-waterborne freight handling activities and others which could negatively affect the ability of wharves to operate effectively.

Locations: Within and adjacent to London's safeguarded wharves.

Plan-making

A Development Plans should:

(1) define the boundaries of safeguarded wharves in accordance with the latest Safeguarded Wharves Review and Directions and ensure site allocations and other relevant policies manage nearby development to ensure that wharves are able to operate effectively 24 hours a day, seven days a week.

(2) in conjunction with the Port of London Authority (PLA) and wharf operators, explore opportunities for new, expanded or more efficient wharves in areas of known deficiency

(3) where Policy PV1 Brownfield First Opportunity Areas and Annex E identifies a need for wharf consolidation to optimise BFOA development potential, in conjunction with the PLA, wharf operators and neighbouring boroughs, explore the opportunities and options for wharf consolidation or adequate compensatory capacity within the same property market area

(4) where applicable, appropriately manage the release of those wharves where the safeguarding Direction no longer applies, or where a Review has recommended release, ensuring any other wharves in the vicinity are not negatively impacted and overall freight handling capacity is sustained.

Development management

B Development proposals to facilitate an increase in the amount of freight transported on London's waterways should be supported.

C Development proposals on safeguarded wharves should:

(1) reflect the safeguarding protection for waterborne freight use only, making best use of the wharf's capacity and location.

(2) demonstrate that waterborne heavy goods freight-handling capacity and effectiveness is secured long term, 24 hours a day, seven days a week and that existing capacity and functionality would not be compromised as part of any mixed-use or temporary use proposals

(3) Only result in the loss of a safeguarded wharf to non-waterborne freight uses where:

i. it is part of a plan-led process that secures adequate compensatory capacity in the same property market area/wharf sector; or

ii. up to date evidence accounting for different market scenarios demonstrates that the wharf is no longer viable or capable of being made viable for waterborne freight handling.

D Development proposals adjacent to or opposite safeguarded wharves (including vacant wharves) should be designed to ensure that existing or future freight use and capacity is not hindered and is able to operate 24 hours a day and seven days a week, in line with the Agent of Change principle.

E Existing boatyard sites supporting freight transport by water should be protected and development proposals to increase their capacity or range of services should be supported.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.86 Safeguarded wharves can only be released from their safeguarding designation as part of a Safeguarded Wharves Review and subsequent revocation direction. The timing of these relative to Local Plan timetables may mean it is appropriate for such plans to reflect the latest review even if a subsequent safeguarding direction or revocation has yet to be issued.

4.87 Redevelopment proposals for other land uses on safeguarded wharves will need to be embedded in a plan-led process that can interface with this process or produce equivalently robust viability evidence. The scale and form of compensatory capacity assessed to be adequate would typically relate to functionality for handling 'heavy goods' freight (as opposed to that transportable onward by LGV) as well as volume. It should be within the same river sector (as defined in the GLA's wharves evidence) which affects berth/access depths and property market areas. The Mayor has, and will continue to, keep the network of safeguarded wharves under regular review given many are in areas where land is highly desirable for a number of competing uses.

4.88 Alternative use of a boatyard site should only be accepted if the facilities of the site are re-provided at a site with equivalent or enhanced facilities in Greater London. Proposals for new strategic-scale boatyard sites, at an appropriate site within London, will be supported.

Rationale

This policy reflects a number of key considerations:

4.89 Since 2000 a network of wharves in London has been subject to Safeguarding Directions issued by the Secretary of State for Housing, Communities and Local Government. The Safeguarding Directions mean that prior to the grant of planning permission on a Safeguarded Wharf, the Mayor must be consulted, with the London Plan protecting them for waterborne freight handling. This recognises the value of waterborne transport in removing lorries from roads and efficiently importing materials such as marine-won aggregates.

4.90 Evidence[54] indicates that there will be a shortfall in wharf handling capacity over the London Plan period, making it important that capacity is protected, enhanced and promoted in order to meet identified need through this policy. Supporting infrastructure forms part of this protection and promotion, enabling vessels to be appropriately maintained close to where they are used with the efficiency benefits this brings.

GLE11 Circular economy

Policy aim: To support the move to a more circular economy that reduces London's resource

[54] The Safeguarded Wharves Demand and Capacity Study

footprint and makes best use of embodied carbon as part of the transition to net-zero. transition

Applies to: All developments.

Locations: All locations.

Development management

A All development proposals should promote circular economy outcomes and referable proposals should aim to be net zero-waste at the construction stage.

B For referable development, a Circular Economy Statement (CES) - submitted at planning application and post-construction stages should demonstrate how:

(1) pre-redevelopment and pre-demolition audits have informed the design of the proposed development in the context of strategic targets for waste minimisation

(2) the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life, for the whole development

(3) the development has been designed in line with circular economy principles set out at paragraph 4.95

(4) much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy

(5) performance against the targets set out in Table 4.2 will be monitored and reported post-planning and post-construction.

C Development proposals which seek to provide Circular Economy infrastructure on appropriate sites, including as a 'meanwhile use', should be supported.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.91 Table 4.2 sets out a range of strategic targets which support aims to conserve resource, reduce waste and promote material reuse and recycling across London. On an individual application, these are helpful as benchmarks against which to assess the proportionality of what is proposed alongside wider justification, except on referable development where experience shows they should be more achievable.

4.92 All development proposals should be able to demonstrate some consideration of how they can advance circular economy objectives. Referable applications should provide a commitment and provide evidence that demonstrates how they will meet and where possible, exceed these targets. The actual performance against these targets should be reported by applicants as part of the post-completion reporting.

4.93 CES are required for referable applications only, although they may provide a useful framework for other proposals to consider circular economy opportunities.

Table 4.2: Strategic waste stream targets

Waste stream	Minimum strategic target
Demolition waste	95% reuse/recycling/recovery
Excavation waste	95% beneficial reuse[55]
Construction waste	95% reuse/recycling/recovery
Reused or recycled content	20% by value for the whole development

4.94 The CES process should be iterative and help inform design. As such it is helpful for them to be prepared and submitted at pre-application stage for large-scale multi-phased development, developments that involve substantial demolition or masterplan-led schemes.

4.95 The circular economy principles that should be taken into account through demolition, construction and in-use phases are:

- 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
- designing for longevity
- designing for adaptability and flexibility
- designing for disassembly
- using systems, elements or materials that can be reused and recycled.

4.96 Development proposals should seek to manage as much waste on site as possible, and strategies which prioritise retention of existing structures should be robustly considered. Further guidance can be found on the GLA website[56], which will be updated as appropriate to account for best practice.

4.97 There is a close relationship between the circular economy statement and the Whole Life Carbon Assessment. It should be ensured that where metrics/criteria overlap, the same are used in both assessments.

Rationale

This policy reflects a number of key considerations:

4.98 While the importance of supporting a more circular economy is acknowledged in national policy, it is not set out how this should happen. This policy seeks to address that gap in the London context.

4.99 This is important in delivering the Mayor's London Environment Strategy which includes objectives to support a transition to a circular economy, cut waste and boost recycling. The policy seeks to ensure that circular economy principles – and a whole life

[55] All inert excavation waste should be put to beneficial use
[56] Circular Economy Statement Guidance | London City Hall

cycle view – are incorporated into the design of referable developments and that it supports the provision of circular economy infrastructure.

4.100 The Mayor views waste as a resource to be managed rather than a problem to export. Cutting waste and recovering more value from it through applying circular economy principles can have positive environmental and economic benefits for London, including but not limited to job creation, saving resources, increasing resource efficiency of London's businesses, and helping to reduce carbon emissions.

GLE12 Waste

Policy aim: To plan for sufficient waste infrastructure capacity and support a move towards net waste self-sufficiency and improved waste sustainability

Applies to: Local Plans and developments involving waste uses

Locations: All locations

Plan making

A Development Plans should plan positively to contribute towards more sustainable waste management in London including net self-sufficiency in line with the proximity principle, prioritising reuse, recycling and circular economy needs;

B Development Plans should plan – preferably cross-boundary - for the range of infrastructure required to manage and reduce waste through a combination of protection of waste sites, identification of suitable new sites and opportunities for expansion or intensification, and facilitation of reprovision where appropriate. This means ensuring:

(1) provision is sufficient to manage the apportioned tonnages of materials and waste, as set out in Table 4

(2) no net loss in capacity of strategically important waste management, including that required to manage construction, demolition and excavation (CD&E) and hazardous waste materials within London, and

(3) provision continues to be made for other non-apportioned waste uses.

C In identifying sites and capacity to protect and allocate to meet apportionments and other needs, the following should be considered:

(1) existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their (environmentally appropriate) capacity

(2) SILs and LSISs, including safeguarded wharves with an existing or future potential for waste and secondary material management

(3) proximity to strategic roads, safeguarded wharves and railheads which may help reduce transport-related impacts.

D Where a site is identified for release in a development plan it should either:

(1) be demonstrably surplus to both the borough and other London boroughs in apportionment terms, having been first offered to other boroughs that have not yet met their apportionment targets

(2) be replaced with equivalent capacity at the same level or higher in the waste hierarchy, unless it is strategic waste management capacity in which case equivalent capacity should be provided at a like-for-like facility.

Development management

E Waste sites should be protected as such unless either:

(1) the site has been identified within an adopted waste plan for release

(2) compensatory capacity at the same level or higher of the waste hierarchy is provided, with throughput at the same level or higher, with the location taking into account site characteristics and the proximity principle. Where strategically important waste infrastructure is proposed to be lost, like-for-like compensatory capacity should be secured. Where a hazardous waste site is involved, any replacement should provide equivalent hazardous waste management capacity.

F Development proposals for new waste management sites or increased waste management capacity at existing sites should:

(1) have reviewed and where possible responded to opportunities to move waste up the waste hierarchy and contribute to the delivery of a circular economy

(2) where appropriate, deliver a range of complementary waste management and secondary material processing facilities on a single site

(3) address the locational considerations in part C, and

(4) achieve at least a no net worsening of carbon and air quality outcomes.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.101 A waste site is defined as either:

- a site whose primary activity is a waste-management operation that is authorised by the Environment Agency
- a site that has a lawful planning use as a waste site.

4.102 Strategic waste-management capacity is defined as sites that are critical to the management of London's waste – such as dry mixed-recycling facilities; facilities that handle food waste; waste-transfer sites; or waste sites linked to wharves and railheads.

4.103 Environmentally appropriate capacity maximisation will largely be determined by separate nuisance legislation, but the evolving nature of a place should also be taken into account, given that the Agent of Change principle only applies to established use intensity.

4.104 Table 4.4 shows estimated projections of arisings for household, commercial and

industrial waste for each borough, that underpin the overall apportioned quantums that should be planned for. In addition to apportioned waste, waste-planning authorities should ensure that their plans seek to meet the demand for waste streams that are not apportioned, and other infrastructure that could include, but is not limited to, hazardous

Borough	Apportionment*	2024	2030	2040	2050
Barking and Dagenham	6.6	506	536	603	676
Barnet	2.4	183	194	219	245
Bexley	5.6	431	456	513	575
Brent	4.7	363	385	433	485
Bromley	3.5	269	285	320	359
Camden	1.5	118	125	140	157
City of London	2.1	165	175	196	220
City of Westminster	1.6	126	133	150	168
Croydon	3.0	234	248	279	313
Ealing	4.7	366	387	436	488
Enfield	4.8	369	391	440	493
Greenwich	3.3	253	268	301	337
Hackney	1.5	115	122	137	153
Hammersmith and Fulham	1.7	133	141	158	177
Haringey	2.4	187	198	223	250
Harrow	1.7	133	141	158	177
Havering	4.6	357	378	425	477
Hillingdon	5.9	453	480	540	604
Hounslow	4.8	368	390	438	491
Islington	1.8	139	148	166	186
Kensington and Chelsea	1.0	77	82	92	103
Kingston upon Thames	1.9	145	154	173	194
Lambeth	1.7	129	137	154	173
Lewisham	2.6	199	211	237	265
Merton	3.1	236	250	281	315
Newham	4.9	379	402	452	506
Redbridge	2.2	166	176	198	222
Richmond upon Thames	1.6	124	131	148	166
Southwark	3.0	230	244	274	307
Sutton	3.2	250	265	298	333
Tower Hamlets	1.9	149	158	178	199
Waltham Forest	2.4	186	197	221	248
Wandsworth	2.1	163	173	195	218
London Total*	**100%**	**7,699**	**8,159**	**9,177**	**10,281**

waste, waste transfer sites and CD&E waste. The policy identifies locational criteria that should be considered in identifying the suitability of a proposed or potential waste.

Table 4.3: Borough-level apportionments of household, commercial and industrial waste 2024-2050. Rounded to the nearest kilo tonne.

*Apportionment is per cent share of London's total waste to be managed by borough.
**NB. Totals do not add up to exactly 100 per cent or total tonnage due to rounding.

Table 4.4: Forecast (kilo tonnes) arisings of household, commercial and industrial waste by borough 2024-50

Borough	2024	2030	2040	2050
Barking and Dagenham	563	594	641	689
Barnet	242	259	291	325
Bexley	374	394	429	468
Brent	343	365	407	449
Bromley	397	420	475	547
Camden	140	149	169	192
City of London	275	307	373	452
City of Westminster	189	199	225	255
Croydon	302	319	365	413
Ealing	259	274	304	334
Enfield	298	314	355	401
Greenwich	292	313	353	392
Hackney	122	125	135	148
Hammersmith and Fulham	87	93	107	121
Haringey	172	182	206	224
Harrow	154	162	181	198
Havering	300	316	367	427
Hillingdon	356	377	436	501
Hounslow	273	291	332	379
Islington	202	217	246	281
Kensington and Chelsea	56	56	59	63
Kingston upon Thames	102	106	120	131
Lambeth	130	137	151	167
Lewisham	278	294	326	366
Merton	272	288	323	362
Newham	333	358	408	457
Redbridge	213	223	255	286
Richmond upon Thames	80	80	80	82
Southwark	318	343	396	450
Sutton	132	138	153	170
Tower Hamlets	157	166	187	201
Waltham Forest	145	150	164	174
Wandsworth	142	149	160	174

London Total	**7,699**	**8,159**	**9,177**	**10,281**

4.105 MDCs should cooperate with host boroughs to support them in meeting identified waste needs. Where appropriate, MDCs are encouraged to join the relevant waste planning group.

4.106 A borough's ability to meet its apportioned waste needs in full is key to supporting a move towards overall waste net self-sufficiency. Waste plans should be responsive to strategic opportunities within their areas to optimise capacity on existing waste sites, or that help to unlock investment in developing new waste sites or meeting other needs. As such, any proposed release as part of a plan-led process should robustly demonstrate that the loss would not impact on the ability to meet this apportionment target directly (for the borough in question) or indirectly (where it may be a site of interest to other proximate boroughs to meet their apportionment needs). If it is confirmed that it is needed by another proximate borough, a borough in the same waste planning group and/or where there is an existing waste flow, then that should be reflected in the respective waste plan(s). Alternatively, should a waste site be proposed to be released, and a borough is not meeting its identified waste needs, then compensatory capacity is required to be secured through the plan.

4.107 Where required, compensatory capacity should be at the same level or higher within the waste hierarchy, and at least meet (and should exceed) the maximum achievable throughput of the site proposed to be lost. This should be provided prior to the loss of the existing waste site. If a site is not operational at the time that a planning application has been submitted, the maximum throughput over the five years preceding the closure should be used. Where a strategically important waste infrastructure is proposed to be lost, like-for-like compensatory capacity must be secured, i.e. the same waste infrastructure type/specialism, and at least the same capacity, as the waste site proposed to be lost. Where compensatory capacity is to be provided at an existing waste facility, then it should be demonstrated that this is in addition to any capacity that has been identified as meeting apportionment targets and/or waste needs for the borough in which the facility is located.

4.108 Compensatory capacity should be located as close as possible to the existing waste site, taking into account relevant planning designations, waste planning and property market areas, plus the wider spatial strategy approach of providing for some industrial land needs in the Green Belt. Consideration should also be given to the proximity principle, and transportation routes (including by road, rail and water), when identifying compensatory capacity. Where it is provided outside of a borough or waste plan area, the host borough should be notified to ensure that this is taken into account when reviewing waste plans and/or monitoring requirements.

4.109 New waste sites in appropriate locations, as identified in the policy, should be supported. Clear evidence should be provided on how the development proposal is delivering against the policy criteria. Applications should also set out whether the proposed waste site is contributing towards a borough's apportionment target, and/or how it is otherwise meeting an identified waste need. For new waste sites coming forward, applicants are strongly encouraged to ensure that they achieve a carbon positive outcome. Where waste heat will be generated, proposals should take into account the GHR2 Low-cost low-carbon heat.

Rationale

This policy reflects a number of key considerations:

4.110 As required by the National Planning Policy for Waste, the policy sets out the apportionment requirements for each of the London boroughs. The Mayor's London Environment Strategy identifies that the Mayor wants to retain the economic value of London's waste within London, and ensure that London can manage net 100 per cent of its waste within the city. To support achieving this, sufficient waste sites to meet apportionment requirements must be safeguarded through relevant development plan documents.

4.111 Acknowledging that waste streams are not confined by borough boundaries, and are influenced by market conditions and/or land availability, the policy encourages boroughs to pool requirements and, where necessary, share surplus capacity to achieve the London-wide ambition of waste self-sufficiency. To ensure that there is no loss in waste capacity whilst also allowing for flexibility for a waste site to be redeveloped (should it be required to meet other strategic objectives) e.g. housing, compensatory capacity must be provided to ensure that there is no loss in waste capacity.

GLE13 Aggregates and mineral resources

Policy aim: To ensure a steady and adequate supply of land-won aggregates within London up to 2050 and deter any proposals for hydraulic fracturing ('fracking') in London.

Applies to: Minerals planning and extraction/post-extraction.

Locations: Those boroughs with landbank apportionments and any location where fracking is proposed.

Plan-making

A Plan-making authorities with an apportionment should:

(1) make provision through site allocations, designation of preferred areas and areas of search for a landbank for seven years supply of at least 5 million tonnes (mt) of land-won aggregates up to 2050 through a landbank apportionment of:

- at least 1.75mt to LB Havering
- at least 0.7mt to LB Redbridge
- at least 1.75mt to LB Hillingdon
- at least 0.7mt to LB Hounslow

(2) examine the feasibility of using quarries for construction, demolition and excavation recycling sites where extraction has ceased.

Development management

B Development proposals for exploration, appraisal or production of shale gas via hydraulic fracturing ('fracking') should be refused.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

4.112 All of London's boroughs, together with the MDCs, are Mineral Planning Authorities (MPAs). On behalf of all London MPAs, in recent years, the Mayor has conducted the Local Aggregates Assessment (LAA), which regularly reviews the demand and supply of aggregates in the capital (now and into the foreseeable future) against London's landbank requirements. As such, the most up-to-date version should be used to help boroughs in plan-making to ensure a steady and adequate supply of aggregates. Most of the policy relating to minerals and aggregates is contained in the NPPF; as such, this policy should be read in conjunction with it. There is also a close relationship with MBUL5 Sustainable Transport to enable London's growth; GLE10 Safeguarded Wharves, which will support additional supply from imports; and GLE11 Circular Economy which supports the supply for secondary and recycled aggregates.

4.113 The Mayor will continue to work with boroughs, and the London Aggregates Working Party to prepare LAAs on behalf of all MPAs in London.

4.114 There is a moratorium on issuing any further hydraulic fracturing licences nationally, until compelling new evidence is provided which addresses the concerns relating to the prediction and management of induced seismic activity. This precautionary approach should be mirrored in respect of planning consents, given such risk is at odds with many planning considerations relating to health, the environment, housing capacity and protection of vital infrastructure and economic activity. The Mayor will actively monitor future changes in national policy and legislation with regard to fracking and will publish a formal statement of supersession when part B of this policy is no longer deemed necessary.

Rationale

This policy reflects a number of key considerations:

4.115 There is a statutory requirement for MPAs to maintain landbanks (permitted reserves) of at least seven years for sand and gravel.

4.116 The apportionment targets are both justified and realistic, contributing to the national Managed Aggregate Supply System. Whilst only four boroughs have apportionments identified, other London boroughs are encouraged to bring forward supplies of aggregate.

4.117 London is in an area that is unlikely to be geologically suitable for fracking and is not within an area found to be commercially viable for fracking but has nonetheless had some licensing interest in the past. At present it is not possible to determine that fracking can be undertaken safely in the UK, due to the British Geological Society findings highlighting that the risk of possible seismic activity cannot be reliably predicted, as set out in Written Ministerial Statement from 2022, and reiterated in 2024. Given that risks would be magnified in London due to the density of population, economic activity and infrastructure, the extensive Source Protection Zones where groundwater must be protected, and the Mayor's broader climate change obligations, it is clear that fracking is not compatible with the Mayor's Good Growth objectives from a planning perspective.

5 Creating a greener, healthier, and resilient city

Reasoned justification for chapter 5

5.1 London's ability to grow sustainably depends on responding to the climate emergency and to the environmental and health challenges - and opportunities - facing the city. Planning policy is a key lever in tackling these issues in a cost-effective way, shaping the location, form and environmental performance of new development.

5.2 The policies in this chapter seek to ensure that development helps work towards London's net zero carbon ambition, improves the resilience of the city to the impacts of climate change, helps to conserve and enhance the natural environment, reduces pollution and exposure to pollution. This chapter, and other parts of the London Plan (such as Healthy Streets and Housing Design) are relevant in ensuring that the built environment improves physical and mental health outcomes and addresses health inequalities.

5.3 The climate emergency requires both rapid carbon reduction and adaptation to more extreme weather. London has demonstrated that carbon reduction and economic growth can go hand in hand. London has reduced its carbon emissions by 44 per cent below the peak of emissions in 2000, despite population and economic growth. However, further action is essential to meet national and international commitments (including the UK's legally binding net-zero-target), and fulfil the Mayor's statutory duty under the GLA Act 1999 to address climate change. Domestic and non-domestic buildings in London together account for 63.5 per cent of London's direct greenhouse emissions[57] and new developments represent a major source of carbon dioxide, particularly through embodied carbon emissions.[58]

5.4 To deliver comfortable, affordable, healthy and sustainable homes requires high levels of energy-efficiency to be achieved in developments. This Plan drives an approach to building design that seeks to minimise energy use through both construction and occupation. As buildings become more energy-efficient and the electricity grid decarbonises, embodied carbon associated with building materials are a greater proportion of building emissions. This Plan therefore also requires the assessment and reduction of embodied carbon through whole life carbon assessments, ensuring that the full carbon emissions of development are understood and addressed, and further informing future design choices.

5.5 Rising temperatures and more frequent heatwaves pose growing risks to health, particularly in London's dense urban environment which intensifies the Urban Heat Island (UHI) effect. Development needs to reduce its contributions to the UHI effect; and ensure buildings are designed to deliver heat resilience for current and future heat risks.

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[57] London Energy and Greenhouse Gas Inventory (LEGGI) 2023

[58] According to the Net Zero Whole Life Carbon Roadmap technical report (2021) published by the UK Green Building Council, embodied carbon emissions contribute to some 40-50 mt of CO2 annually – more than emissions from aviation and shipping combined.

This is best done through passive design solutions that minimise occupants' energy costs and further knock-on effects by avoiding increased reliance on active cooling. Flood risk, especially from surface-water, is also increasing in London's denser urban context and is not fully addressed by national policy. This Plan takes forward actions from the London Surface Water Strategy (2025) to reduce flood risk and improve resilience through sustainable drainage systems and flood-resilient design.

5.6 Protecting and enhancing the natural environment is fundamental to creating a greener, resilient and healthy city. Within the scope of this Plan, this means the inclusion of policies that set out approaches for protecting and managing impacts on designated sites, existing trees of value and geodiversity, while promoting the delivery and ongoing management of new and enhanced habitats as part of development. The Urban Greening Factor (UGF) provides a transparent and consistent tool to secure urban greening across sites and buildings. These policies align development outcomes with the London Local Nature Recovery Strategy (LNRS) and the LGIF, and support national Biodiversity Net Gain (BNG) requirements, ensuring that greening interventions are targeted where they can deliver the greatest environmental and social benefits, and that the types of greening delivered are locally relevant.

5.7 Green infrastructure plays a vital role in supporting physical and mental health, reducing health inequalities, mitigating flood and heat risk, and improving quality of life. Although London is a relatively green city with approximately 50 per cent of its area being 'green cover' (including tree cover, private gardens, verges, and green roofs) access to green space varies significantly across the city. As density increases, accessible green space (AGS) become ever more important. The Plan seeks to improve green spaces, increase access to them within walking distance, prevent net loss of designated AGS and ensure that green spaces are well designed, multifunctional and supported by long-term management.

5.8 London's waterways are also essential environmental and cultural assets that contribute to the city's identity. The Plan seeks to secure waterways as shared public assets that support health, biodiversity, identity and long-term resilience by integrating waterway strategies into development plans and requiring development to improve water quality and provide inclusive access and climate-resilient design.

5.9 Air pollution is an important and avoidable cause of poor health and a key driver of health inequalities in London.[59] Planning can play a critical role in reducing exposure to pollution and this Plan seeks to ensure new development is at least air quality neutral (AQN) and meets relevant air quality benchmarks. Transport choices also have a direct impact on air quality – as well as carbon emissions, safety and health outcomes. The Plan promotes an increase in active and sustainable travel by setting standards for cycle parking (thereby enabling cycle ownership and use) and minimising car parking provision (which is fundamental to managing congestion and making efficient use of land) as well as reducing environmental impacts.

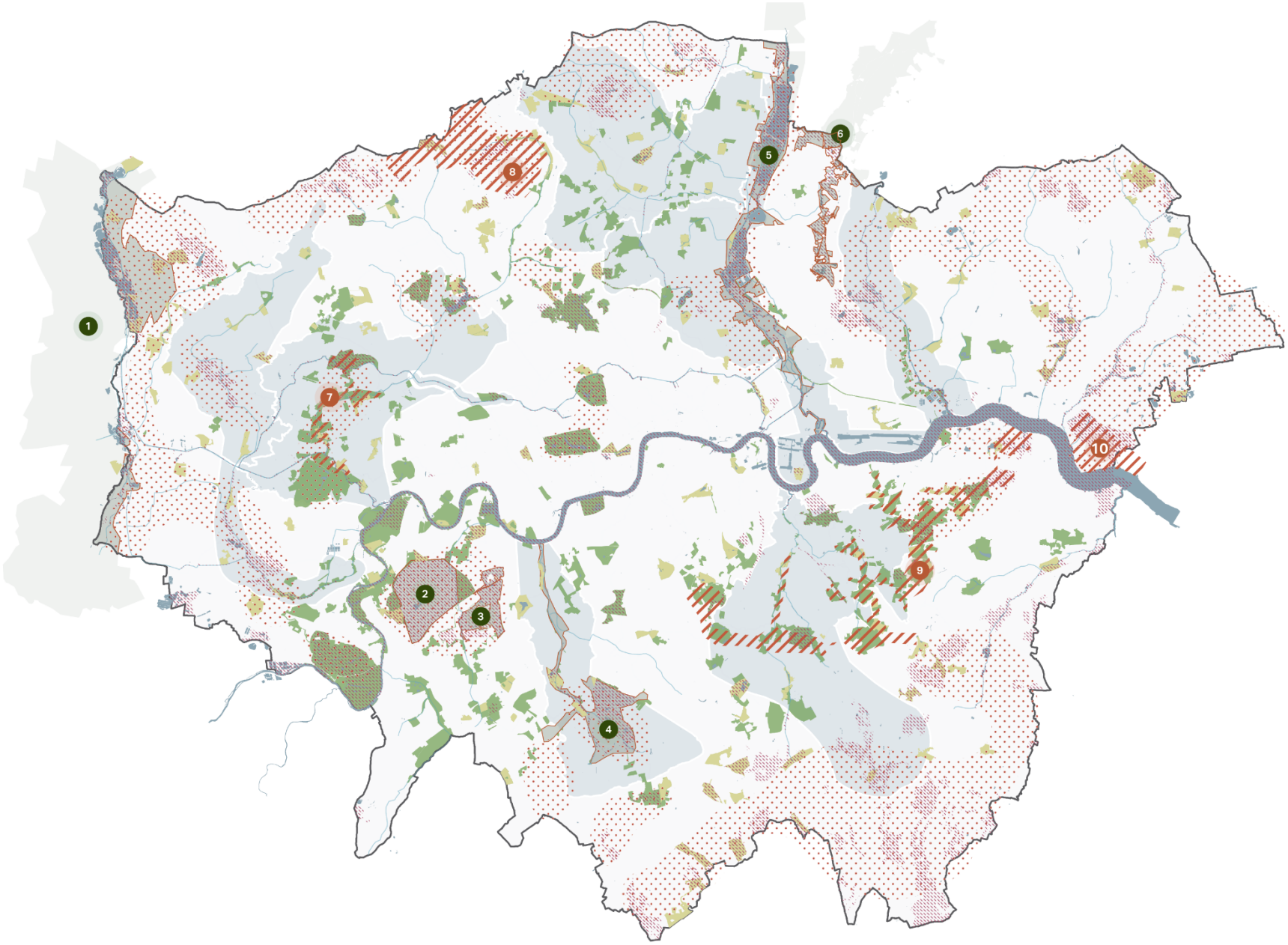
5.10 It should be possible to tackle these environmental challenges and still deliver economic growth. In doing so, however, it is important not to add to the cumulative burdens on new development to the extent that viability is undermined. It is important also to recognise the context of the draft NPPF and the government's aims of simplifying the planning system. This Plan therefore prioritises the most important policy aspects for London that respond to its particular challenges as distinct from many other parts of the

[59] London Air Quality and Health Programme Office – London Health and Care Partnership

country; and at the same time seeks to embed more consistent standards across the city to help streamline requirements for developers.

5.11 The sub-key diagram illustrates the Greener, Healthier and Resilience policies spatially where relevant, but should be read in conjunction with the key diagrams and infrastructure sub-key diagram in chapter 2 and the places sub-key diagram in chapter 6.

Figure 5.1: Environment sub key diagram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KEY

- Metropolitan Open Land (MOL) *(see also Places sub-key diagram)*
- Strategic-scale Accessible Green Space (AGS)
- Metropolitan SINCs
- Key waterways/waterbodies

Environment Opportunity Areas

- Existing Regional Parks
  - 1 Colne Valley Regional Park
  - 2 Richmond Park
  - 3 Wimbledon and Putney Commons
  - 4 Wandle Valley
  - 5 Lee Valley Regional Park
  - 6 Epping Forest
- Local Nature Recovery Strategy (Extensive Potential Measure Locations)
- Regional Park Opportunities
  - 7 West London Regional Park
  - 8 Barnet Regional Park Opportunity
  - 9 South-East Green Chain
  - 10 Rainham Wildspace / London Riverside Conservation Park
- Clean and Healthy Waterways Strategic Locations

GHR1 Energy-efficiency

Policy aim: To ensure high levels of energy-efficiency, minimise energy consumption and occupier bills, and reduce greenhouse gas emissions towards a net zero-carbon London

Applies to: All local plans and all major development.

Locations: All.

Plan-making

A This policy sets the energy-efficiency requirements for development in London; plan-making authorities should not set their own energy-efficiency or emissions reduction standards in local plans.

Development management

B Developments should minimise energy consumption through highly energy-efficient building fabric measures, design and heating systems.

(1) Development should minimise both annual and peak regulated and unregulated energy demand by meeting the following minimum energy use intensity (EUI) and space heating demand (SHD) standards:

SHD

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

EUI

kWh/m2/yr (GIA)	Baseline target	Aspirational target
Residential	40	35
Office	90	70
Primary school	40	35
Industrial	40	35
Hotel	120	80
Student accommodation	65	50

(2) Major refurbishments and developments that do not fall into these use classes should minimise and report EUI and SHD levels (with reference to relevant industry benchmarks).

C Development should maximise the opportunities for the provision of renewable energy by producing, storing and using renewable energy on-site.

D Development should monitor and report annual in-use energy demand post-construction

for at least five years.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

5.12 Clauses B-D apply to major developments.

5.13 EUI is the total energy (regulated and unregulated) used by a building over a year, measured in kWh/m2/yr. SHD is the amount of heat energy needed to heat a building over a year measured in kWh/m2/yr. The design of a building's form, fabric and ventilation systems affect SHD.

5.14 Specific EUI targets have been set for the most common building uses that have broadly predictable energy consumption at planning stage. Uses not covered by the typologies set out in Part B(1) should still aim to design for efficiency in-use and submit information on EUI and SHD, with reference to industry benchmarks (such as Low Energy Transformation Initiative (LETI) and the UK Net Zero Carbon Building Standard (UKNZCBS) where relevant.

5.15 Design decisions to meet this policy should be considered alongside other relevant policies, such as GHR3 Whole-life-cycle-carbon which covers upfront embodied carbon and whole-life-cycle carbon (WLC); GHR4 Heat risk and GHR2 Low-cost low-carbon heat, which sets out requirements for determining the optimum heating strategy for a development. Information on how the elements of the policy have been addressed should be set out in an energy statement or proforma in line with the Energy Assessment Guidance alongside a low-carbon heat appraisal where required by GHR2.

5.16 Different policies may require use of a building's roof area for different purposes, such as green roofs, amenity spaces, solar photo-voltaic (PV) and other building plant. Proposals should consider any overlapping roof-space needs and aim to optimise designs for maximum benefits. Where elements cannot be co-located, designs should prioritise measures that result in localised benefits e.g. green roofs that deliver identified local biodiversity priorities, or PV that delivers direct benefit to building occupiers.

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

Rationale

This policy reflects a number of key considerations:

5.18 The Mayor of London has specific legal duties in relation to climate change. The GLA Act 1999, (as amended by the GLA Act 2007 and Climate Change Act 2008) requires mayoral strategies to contribute to mitigating climate change (i.e., reducing greenhouse gas emissions). London's homes and workplaces are responsible for producing approximately two-thirds of the city's greenhouse gas emissions. If London is to become a resilient, net-zero carbon city, new development must be as efficient as possible, also helping to

ensure that buildings are fit for purpose over the lifetime of the development and reducing the future burden and cost of retrofit.

5.19 The London Plan therefore sets standards that go beyond those in national Building Regulations. In doing so the Mayor is cognisant of the context of the draft NPPF which seeks to standardise energy-efficiency requirements at the national level. However reverting to national standards would not only undermine progress towards net zero and the fulfilment of his legal duties, but would represent a *worsening* of the current position in London which seems untenable in the context of the climate challenges facing the city. London has consistently and effectively achieved higher standards than those set by national requirements. [60]

5.20 Recognising the aims of the NPPF to streamline planning and reduce complexities and burdens on development (particularly given viability challenges), the London Plan policy sets standards (using industry recognised metrics) which are intended to apply London-wide - thereby avoiding a multiplicity of separate standards and a ratcheting up of requirements and costs on development. In weighing up the different objectives and considerations, the Plan has struck a careful balance between the need to reflect the particular context of London while aligning as far as possible with the intent of the NPPF.

5.21 This Plan sets a streamlined approach to carbon and energy and the effect of all related policies need to be considered in combination. The focus on very good energy-efficiency standards is considered to be particularly important for London given the technology-neutral approach to low-carbon low-cost heat, introduced in GHR2 and the removal of carbon offsetting policy.

5.22 Furthermore ensuring new development has low energy demand can also help to mitigate overall impacts of growth on energy infrastructure. This is particularly important given constraints on development being experienced at present levels of growth (e.g. in West London) and already significant increases in demand expected in any scenario as part of overall electrification.

5.23 The approach will also help to continue to drive innovation in sustainable design. Innovation of cities such as London not only provides essential experience and data, it also builds the demand and deployment of low carbon materials and products that help to drive the green economy – a key growth sector for the UK.

5.24 Use of the SHD and EUI metrics ensures that a building's design prioritises minimising energy use and allows performance to be more accurately and easily compared against in-use performance. The policy sets both baseline and aspirational targets for SHD and EUI to allow flexibility to adapt to changes in modelling methodologies (e.g. to accommodate updates to Part L Building Regulations methodology) and technological solutions, and to set appropriate levels of ambition over the lifetime of the Plan.

GHR2 Low-cost low-carbon heat

Policy aim: To ensure developments are supplied with the lowest cost, lowest carbon heating source and ensure that best use is made of waste heat

[60] London Plan Energy Monitoring Reports (EMR) https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/energy-monitoring-reports

Applicable to: Local Plans, Major developments and developments that generate significant waste heat

Locations: All

Plan-making

A Plan-making authorities should clearly set out identified (and if approved, designated) Heat Network Zones in local plans.

Development management

B All major developments, should submit a Low Carbon Heat Appraisal to establish the optimum low carbon and low cost (considering upfront, whole life and end user costs) heating solution for their site.

C Where relevant, it is expected that this optimum solution would comply with the government's Heat Network Zoning Regulations.

D Development proposals that will result in the generation of waste heat should engage with the LPA[61] for an opinion on whether the waste heat will be of an appropriate scale and temperature for supply into a heat network, as well as at a location of interest to a heat network developer. Where directed as a consequence of this opinion, a waste heat utilisation plan should be prepared, and the development proposal should incorporate design and specifications that optimise the opportunity for heat capture, storage and distribution infrastructure as required, to enable cost effective and timely heat supply to an existing or future heat network.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

5.25 The optimal heating choice will be affected by a combination of technology, development scale and location, and fabric efficiency. It comprises assessment of both communal versus individual systems, and different heat source technologies. The Low Carbon Heat Appraisal template draws these considerations together so that options are evaluated on a level playing field. The process is designed to interface with emerging national positions on heat networks, including the outputs of the government's heat network zoning model which identifies areas where heat networks will be the lowest cost, low carbon option for many developments. If the national process mandates connection and that is what the development has proposed, a heat appraisal will not be required.

5.26 LPAs and, in time, Zone Coordination Bodies will be important intermediaries between heat users, heat network operators and heat generators, with their advice drawing on their LAEPs. Engagement with these bodies as per the requirement in MBUL4 should help inform the heating solutions that are appraised as well as infrastructure provision to best capture waste heat.

[61] Or Zone Coordination Body once established; the LPA may also facilitate contact with the heat network developer where in place.

Rationale

This policy reflects a number of key considerations:

5.27 The policy requirement for Low Carbon Heat Appraisals will establish the lowest-cost, lowest-carbon heating solution for individual proposals and help decision-makers determine whether individual or communal systems are most appropriate; and which heat source is best suited. This is intended to provide more flexibility and an objective approach to identifying the best solution.

5.28 The policy aligns London with the national approach; with the above applying unless a specific approach is mandated by the government heat network regulations. It also brings considerations around heating system and fabric efficiency together, given that these will affect running costs.

5.29 Development proposals that generate heat should be considered for their suitability to connect and contribute to local heat networks; the LPA (zone coordinator) is best placed to advise on this.

GHR3 Whole life-cycle carbon

Policy aim: To assess and reduce the upfront and WLC associated with development and construction.

Applies to: All referable[62] applications.

Locations: All.

Development management

A Referable applications on sites that include existing buildings and structures should assess the potential for retaining those existing structures as part of redevelopment proposals to minimise embodied carbon emissions. A pre-redevelopment audit should be submitted to inform decisions on the appropriateness of demolition in line with Policy GLE11 Circular Economy.

B All new buildings should demonstrate that upfront embodied carbon has been considered and reduced where possible through good design and material efficiency. This should include a summary of the construction type and the efforts made to design a lean, low carbon development.

C Development should calculate and reduce upfront embodied carbon emissions.

(1) As a minimum, proposals should meet the relevant baseline targets and aim to meet the aspirational targets:

	Baseline target	**Aspirational target**
Residential <11m	500kgCO2e/m2	400kgCO2e/m2
Residential ≥11m	700kgCO2e/m2	565kgCO2e/m2
Use Class E	700kgCO2e/m2	605 kgCO2e/m2

[62] As defined in the glossary

(2) Development not included in the above use classes should reduce and report upfront carbon emissions, referencing relevant industry benchmarks where available.

D Developments should minimise WLC emissions and maximise resource efficiency over a building's lifespan. WLC emissions should be reported via the GLA Assessment tool and in accordance with principles outlined in WLC guidance.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

5.30 Where development takes place on sites with existing buildings and structures, there are opportunities to reduce embodied emissions by making use of those buildings where feasible. Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option. Significant retention and re-use of structures also reduces construction costs and can reduce the overall timescale for the development process.

5.31 These options, however, need to be considered in the context of ensuring that the site capacity is optimised in line with the requirements of MBUL2, Optimising the use of land and site capacity, and the delivery of suitable high quality commercial space commensurate with the strategic functioning of CAZ in line with PV2 Central Activities Zone, and should not be used as a means of blocking appropriate redevelopment.

5.32 This will also include assessment of the carbon associated with the energy a building uses over its lifetime and weighing up benefits of the improved energy-efficiency of a new building with the embodied carbon benefits of building retention.

5.33 Considerations of building retention should be set out as part of a pre-redevelopment audit that considers alternative development options for the site and aligns with requirements of GL11 Circular Economy and related WLC and CE guidance.

5.34 Alongside the submission of a WLC assessment, with data on how the upfront embodied carbon emissions targets have been met, applicants should provide information on how the building structure and other elements have been designed to minimise embodied carbon, the building form factor (exposed external surface area/GIA); any high-carbon design elements (such as basements, podiums, large cantilevers, non-typical structural interventions); and wall and superstructure proposals. It is also important to consider WLC emissions to inform design choices that may have an impact over the lifetime of the development.

5.35 Class E covers a wide range of uses and differing building typologies. The upfront embodied carbon targets are considered to be appropriate for the majority of schemes, but it is recognised that the baseline may be more challenging for some important economic uses on highly constrained sites. Applicants should demonstrate how the principles in policy GHR3 have been applied to minimise upfront embodied carbon and set out clear justification where targets are not met.

5.36 The approach to calculating upfront embodied carbon and WLC emissions, including what they should contain and how information should be reported, is set out in WLC guidance. In-use energy should be reported using the same methodology as is used for reporting operational emissions in line with GHR1 Energy-Efficiency.

Rationale:

This policy reflects a number of key considerations:

5.37 To fully capture a development's carbon impact, a WLC approach is needed to capture its embodied emissions (i.e. those associated with raw material extraction, manufacture and transport of building materials and construction; emissions associated with maintenance, repair and replacement; and dismantling, demolition and eventual material disposal) alongside its operational emissions.

5.38 As the electricity grid decarbonises and operational emissions reduce, embodied carbon has become a larger proportion of the carbon emissions associated with the built environment. As such, tackling embodied carbon is relevant as part of the Mayor's duties in relation to climate change. There is no national regulation or policy requirement for embodied carbon, however there are significant opportunities to influence embodied carbon through the design and planning process. Minimising upfront embodied carbon can lead to leaner, more efficient design and form; and lower carbon materials.

5.39 The London Plan has helped lead the way in setting standards that have subsequently informed the national approach in relation to climate change. Innovation of cities such as London not only provides essential experience and data; it also builds the demand and deployment of low-carbon materials and products that help to drive the green economy – a key growth sector for the UK.

GHR4 Heat risk

Policy aim: To reduce contributions to the UHI effect and reduce and mitigate overheating impacts on occupants.

Applies to: All major development.

Locations: All.

Development management

A Development should, through masterplanning and design, reduce contributions to, and mitigate impacts of, the UHI effect by:

(1) prioritising provision of appropriately designed green and blue infrastructure to cool and provide shade

(2) prioritising use of high albedo materials on buildings and public realm, particularly on roofs and other hard surfaces

(3) considering the impacts of building form, orientation and layout on microclimate to ensure adequate airflow to disperse heat

(4) minimising the rejection of waste heat from buildings (including from air

conditioning).

B In planning for heat-resilient buildings, the risk of future warmer-climate scenarios should be considered and mitigated as part of a passive design approach to development, to account for London's particular overheating risks. In addressing and mitigating heat risk, applicants for major development should justify, in the planning application, how the design of the development maximises passive design measures, and minimises the energy use associated with any cooling, by using the following measures:

(1) Limiting solar gains – reduce the amount of heat entering a building through optimising orientation; minimising unnecessary glazing; and providing external shading compatible with window design, high-albedo materials, and blue and green infrastructure.

(2) Reducing and removing excess heat – through generous openable window areas and cross ventilation, ceiling fans, mechanical ventilation, and reducing internal heat gains from hot water and heating services.

(3) Minimising the need for active cooling (air conditioning).

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

5.40 Applicants should demonstrate how heat risk has been considered holistically for the whole of the development (including in public and communal spaces) to mitigate UHI impacts - for example by providing shaded areas, and additional green infrastructure or water spaces. Conditions should be used to secure these strategies and features where appropriate.

5.41 Minimising extraneous glazing to prevent overheating needs to be considered alongside other design objectives - including those related to views out and providing adequate daylight and sunlight to ensure good quality spaces for occupants – particularly in residential buildings. Glazing should also be designed to reduce overheating risks and minimise cooling loads in commercial buildings.

5.42 External shading can reduce overheating risk and can be provided in many forms and positions on the facade. It is expected that external shading of windows will be used on facades that receive direct sunlight. Shading needs to be functional and usable and allow windows to also deliver ventilation. The appropriate choice of shading will depend on the orientation of the facade and overall building design. Vertical shadings (such as shutters) should be movable by the occupant to allow user control. On the upper storeys of tall buildings external shading may not be practical and other measures can be used to reduce solar gain.

5.43 Dynamic overheating modelling should be undertaken, and the results provided to demonstrate how passive measures have minimised internal overheating. The principle of using dynamic modelling is to better understand the risks of overheating (particularly in future climate scenarios) and mitigate them as far as possible through passive measures. This should include the potential contribution from design, layout, orientation, materials, shading and the incorporation of green infrastructure.

5.44 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 (Design methodology for the assessment of overheating risk in homes) should be used for domestic developments and TM 52 (Limits of thermal comfort: avoiding overheating) should be used for non-domestic developments. In addition, TM 49 (Design summer years for London) guidance and datasets should also be used to ensure that all new development is designed for the climate it will experience over its design life. Further information will be provided in guidance on how these documents and datasets should be used.

5.45 This policy does not prevent the use of air conditioning in new buildings, and it is likely that it will need to be provided in heat-sensitive uses such as hospitals, care homes, and schools. Once passive measures have been prioritised, then lower energy and cost mechanical measures utilised, active cooling systems (such as air conditioning systems) should be considered after demonstrating the need, using CIBSE overheating assessments. If this assessment does not show a need for active cooling but applicants want to include it, they should demonstrate all feasible passive measures have been incorporated into the design of the development, thereby minimising energy costs for residents/ occupiers (and providing more comfortable temperatures for everyone – including those who might not be able to afford to use air conditioning). Active cooling measures should be designed to maximise efficiency and should aim to reuse the waste heat they produce. Designs of these systems should particularly avoid purging hot air close to residential buildings and amenity spaces. The energy use associated with active cooling should be clearly set out. Applications for residential development should also submit a Good Homes Alliance (GHA) 'early stage overheating risk tool' checklist.

Rationale

This policy reflects a number of key considerations:

5.46 The urban heat island effect is a strategic matter for London and all types of development are affected by and can exacerbate it. Londoners have greater exposure and vulnerabilities related to heat and extreme weather scenarios and the health impacts (e.g heat-related hospital admissions resulting from future warming are disproportionately concentrated in London).[63]

5.47 There is a need to consider the particular characteristics of London, for example in relation to density, building typologies, noise and air quality constraints, and ensure buildings are designed for the temperatures they are likely to experience over their lifetimes.

5.48 It is therefore important that this is addressed through design principles that can mitigate the impact of increasing urban temperatures and minimise energy demand from active cooling. The design stage of a development is the most important opportunity to reduce the risk of current and future overheating, by incorporating passive design measures to minimise the cost of active cooling for the occupier.

5.49 These design measures require little to no energy or cost to operate, whereas active cooling and air conditioning systems consume significant amounts of energy and under conventional operation, expel hot air outdoors, contributing further to the urban heat island effect as well as to energy demand (adding pressure on the electricity network as

[63] Climate Change Committee – 'A well-adapted UK'

well as increasing costs for occupants)

5.50 Therefore, the policy ensures passive measures are incorporated into the building design to minimise the need for active cooling. Given the challenges, this policy is applied to all building uses (current Building Regulations on overheating only apply to residential uses). Furthermore, addressing overheating at the planning stage allows building design to be adjusted more effectively to maximise passive design measures. In contrast, leaving consideration of overheating to the building control stage limits the available solutions, as the building design is largely fixed by that point.

GHR5 Flood risk and drainage

Policy aim: To ensure that new developments contribute to reducing London's surface-water flood risk, improving resilience in a targeted way.

Applies to: All applications.

Locations: Across London.

Plan-making

A Plan-making authorities should:

(1) use the latest available evidence to identify key flow paths and priority areas for surface-water management where wider catchment-based approaches and measures will be secured, including through developer contributions.

(2) plan for Sustainable Urban Drainage Systems (SuDs) at a neighbourhood scale (with reference to catchment-scale plans) in areas of significant planned change, using site allocations, spatial policies and other requirements to help secure their delivery in an integrated way.

Development management

B Development proposals should not increase surface-water runoff; and should maximise opportunities to reduce surface-water flood risk in a manner that is consistent with an integrated water management approach. This means that they should do the following:

(1) Avoid increasing impermeable surfaces and incorporate at least some surface-water capture, reuse and attenuation.

(2) In the case of referable development, aim to achieve on-site greenfield run-off rates as measured in Qbar (mean average flood flow) or 3l/s/Ha (whichever is higher) through a combination of on-site and (contributions to) off-site sustainable drainage measures.[64] In doing so:

i. on-site measures should be prioritised subject to the considerations in (3) below

ii. off-site contributions should be calculated using the latest London-wide

[64] While the National Standards for SuDs suggest a ceiling for brownfield sites, the acute surface-water flood risk issue in London means that this metric is still relevant for the purposes of quantifying appropriate off-site contributions where on site cannot be wholly achieved.

reference rate[65] or an area-specific one where established.

(3) Design on-site measures with reference to the drainage hierarchy set out in Box GHR5, while acknowledging that, where a neighbourhood approach to managing surface-water is in place locally, and/or where on-site opportunities are limited, off-site contributions to area-based SuDs development may be preferable to onsite grey solutions.

(4) Ensure suitable information is made available[66] to update the local Flood Asset Register where new SuDs are proposed.

Box GHR5 Drainage hierarchy

1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)

2) rainwater infiltration to ground at or close to source

3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)

4) rainwater discharge direct to a watercourse (unless not appropriate)

5) controlled rainwater discharge to a surface-water sewer or drain

6) controlled rainwater discharge to a combined sewer.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

5.51 Evidence relevant to planning and prioritising surface-water flood risk mitigation will be found in a combination of strategic flood risk appraisals (including the Regional FRA 2026), the London Surface Water Strategy 2025, SuDS opportunity mapping[67], forthcoming revised Critical Drainage Area mapping, Catchment Plans and Integrated Water Management Strategies[68], Flood Asset Registers and related infrastructure plans. Spatial information regarding particular vulnerabilities – which may relate to protected characteristics or dwelling/infrastructure types – should also be drawn on. The latest available evidence and tools should be used, including information drawn from Rainwater Management Platform and updates to Flood Asset Registers. This information should be used to identify priority locations for interventions, and delivery pathways linked to planning. This will include off-site payment mechanisms as in many cases mitigation will be on highways and public land outside of individual sites.

[65] £4600/m3 or as updated by the GLA
[66] To the Lead Local Flood Authority via the LPA
[67] SuDS opportunity mapping - 2025 (information page) | London Datastore
[68] These at the sub-regional level, and catchment plans provide catchment scale/context evidence

5.52 In addition, it should be recognised that in areas of significant change (typically BLGs that may or may not align with catchments) there may be particular opportunities to address issues more extensively and holistically. This would be through a variety of planning-based levers achieving cumulative and in-combination benefits, by ensuring that they are delivered in an integrated manner. Even if the neighbourhood accounts for only part of a catchment, the wider catchment evidence referenced above should help inform interventions specified.

5.53 All development proposals should be contributing to tackling London's surface-water flood risk. Responses to it should be set out in design and access statements where separate assessments are not required. Doing this in a manner consistent with an integrated water management approach means concurrently addressing flow pathways that may also affect fluvial and/or sewer flooding, and the management of drought and other growth-related water supply pressures. For instance, source control and attenuation may enable reuse or storage for later use as well as managed release, which in turn can result in eligibility for water company environmental incentive payments.[69]

5.54 For referable applications, expectations are higher – given opportunities linked to scale and/or location, with the Qbar metric specified for consistency reasons. While some onsite measures are expected in line with part B(1), it may not be possible to achieve the greenfield run-off rate wholly on site, and indeed it may not be preferable to do so. For example, off-site green interventions may have wider benefits than onsite grey measures. Proposals should tie-in to wider area-based approaches and priorities, including where necessary through one-off off-site in-lieu contributions.

5.55 These should be calculated using the latest London-wide reference rate as published by the GLA; or at a locally-established rate agreed in consultation with the GLA and set out in a Local Plan. Where the full calculated offsetting contribution would not be viable, the level of contribution should be prioritised relative to other environmental off-site contributions in areas of priority intervention identified in Local Plans or post-2025 Critical Drainage Areas. The extent to which this enables the proposal to reach the greenfield runoff rate should be weighed in the planning balance.

5.56 For all schemes considering surface-water management the drainage hierarchy expresses a sequential preference for schemes that deliver multi-benefits, and for many a blue roof or minimal alterations to landscaping and urban greening should be an option if incorporated early in the design process.[70] Where an additional off-site contribution is proposed to help address the policy requirement, this should be robustly justified in light of the site's density, context, viability or wider strategic considerations (which may include how those contributions better deliver area-based approaches).

5.57 Any SuDs proposed should be detailed on the SuDS proforma so that it can be shared with relevant bodies including the Lead Local Flood Authority, and as built information should also be secured in order to build up an understanding of mitigations and assets overtime. Design should also account for water quality needs as per Policy GHR9 Clean and Healthy Waterways. It should also be noted that that policy addresses riverside aspects of fluvial flood where additional to NPPF provisions.

Rationale

[69] Details and information on about Thames Water's incentives and the process can be found in "charging arrangement for new connections services" : see Thames Water, Charges | Developer services | Thames Water

[70] It is recommended that the Rainwater Management Platform resources are used to inform design.

This policy reflects a number of key considerations:

5.58 Flood risk, especially from surface-water, is very significant in London and is not fully addressed by national policy. As demonstrated by the Regional Flood Risk Assessment, much of London's existing infrastructure and many neighbourhoods are at risk, as well as new development. This risk is increasing with climate change and could also be expected to further increase with continued urbanisation.

5.59 This policy takes forward actions from the London Surface Water Strategy (2025) for development to reduce flood risk and improve resilience through sustainable drainage systems and flood-resilient design. It recognises that development designed well from the start can instead mitigate that risk and bring wider area benefits. Greenfield runoff rate is the established metric by which adequacy of response is assessed.

5.60 While the NPPF assumes that on-site provision of SuDs is the route to addressing surface-water flood risk, this is not always compatible with London's typical development plot, density, context and viability profile. It may also in some cases be strategically preferable to contribute to off-site green measures that have wider benefits where wholly on-site green solutions are not achievable. As such a mechanism for off-site contributions is set out, with a London Reference Rate per cubic metre of water storage established. This is derived from the SuDs Opportunity Mapping costings and consideration of a SuDs hierarchy consistent hypothetical approach.

5.61 Viability testing has indicated that, while a full offset payment may not be viable, some level of contribution could form part of the package of assumed developer contributions tested. Moreover, from a delivery perspective greater flexibility is to be supported, and impact-wise taking at least some opportunity to address surface-water flood risk is better than doing nothing.

GHR6 Trees, biodiversity and geodiversity

Policy aim: To protect designated sites for nature and existing trees of value and to promote the provision of new and enhanced habitats, including London's urban forest, as part of development.

Applies to: All development.

Locations: All, (with specific requirements relating to designated sites).

Plan-making

A Plan-making authorities, in local plans, should:

(1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site

(2) seek to increase tree canopy coverage by identifying opportunities for tree planting in strategic locations

(3) use information from London's Local Nature Recovery Strategy (LNRS) and other up-to-date evidence to designate Sites of Importance for Nature Conservation (SINCs)

(4) use evidence from the LNRS to identify opportunities to support nature recovery by

creating, expanding and connecting habitats, and improving the ecological condition of sites, with a view to future SINC designation where appropriate

(5) 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 improve access to nature

(6) support the protection, creation, improvement and connection of priority species and habitats that sit outside the SINC network; and promote opportunities for enhancing them using Local Nature Recovery Action Plans

(7) ensure geological sites of European, national or regional conservation importance are clearly identified and designated

Development management

B Development proposals should deliver new tree planting where possible, to increase canopy cover and deliver multiple co-benefits. This should prioritise larger-canopied species where site constraints allow, provide adequate soil volume and rooting space, and select diverse and climate resilient species to support long-term growth in changing climate conditions.

C Development proposals should ensure that, wherever possible, existing trees of value[71] are retained (including individual trees and groups of trees) and harm avoided, with consideration given to alternative layouts or construction methods.[72] In particular:

(1) if the removal of trees of value is demonstrated as unavoidable, there should be adequate replacement based on the existing benefits of the trees[73] that are to be removed, determined by an appropriate valuation system.[74]

(2) where impacts are proposed submissions should include an Arboricultural Impact Assessment identifying tree quality, constraints and predicted impacts

(3) An Arboricultural Method Statement and Tree Protection Plan should be submitted where works are near retained trees or on constrained sites.

D Development proposals should contribute to London's nature recovery by meeting the following requirements to protect and enhance biodiversity:

(1) SINCs should be protected. For development proposals that are within a SINC, or that are adjacent to or near SINCs, the potential direct and indirect impacts of the development should be adequately assessed. Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

i. avoid damaging the designated features of the site

ii. minimise the overall spatial impact and mitigate it by improving the habitat quality or management of the rest of the site

[71] Trees of value definition: Category A, B, V and lesser category trees where these are considered by the local planning authority to be of importance to amenity and biodiversity, as defined by BS 5837:2012 or replacement

[72] Such as no-dig surfacing, service routing.

[73] The canopy potential equivalent to 15 years' growth

[74] Such as CAVAT or i-Tree

iii. deliver off-site compensation of better biodiversity value.

E Development should deliver gains for biodiversity in accordance with national BNG requirements. LNRS should be used to inform strategic significance for the purposes of BNG calculations. Where BNG requirements are delivered off-site, provision within London should be prioritised.

F Developments should use information in LNRS and the LGIF (and in relevant Local Nature Recovery Action Plans or Biodiversity Action Plans) to inform habitat creation proposals. Schemes should consider future climate scenarios to ensure that habitat proposals are designed to be resilient to changes in climate.

G Proposals that reduce deficiencies in access to nature should be considered positively.

H Development should make a positive contribution to the protection and enhancement of geodiversity, avoiding harm to Regionally Important Geological Sites and Locally Important Geological Sites.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

5.62 Opportunities to increase London's canopy cover should be considered strategically, e.g. where trees deliver the greatest co-benefits, including in/along streets and transport corridors, parks and open spaces, waterways, heat-vulnerable neighbourhoods, areas with low canopy cover and high deprivation, and areas with existing trees that are highly vulnerable to climate change (i.e. where there is a need for succession planting)[75].

5.63 Tree planting contributes significantly to UGF scores, especially large-canopied species. Tree planting should be designed to integrate with SuDS, maximising rainwater capture and infiltration. Designing tree pits to capture rainwater can reduce the need for separate drainage infrastructure. The retention of trees of value reduces the total number of biodiversity units to be delivered in meeting BNG requirements, while new tree planting contributes to onsite units.

5.64 Planning conditions or S106 agreements may be used to secure establishment of any new trees and adequate monitoring and replacement of failures during the establishment period (at least three years).

5.65 Adequate replacement, in cases where full on-site equivalence is demonstrably unachievable, may be considered through partial on-site replacement supplemented by off-site planting in locations identified by the borough (e.g. in the vicinity of the development, heat vulnerable neighbourhoods, deficiency areas for canopy cover/access to nature, and/or a financial contribution secured through a planning obligation (s106) to fund strategic planting, establishment and early-years maintenance that achieves equivalent value to the loss identified through the valuation.

[75] See the LGIF for information https://apps.london.gov.uk/lgif/

5.66 SINCs comprise:

- Sites of Metropolitan Importance – strategically-important conservation sites for London
- Sites of Borough Importance – sites that support habitats or species of value at the borough level
- Sites of Local Importance – sites that are important for the provision of access to nature at the neighbourhood level.

5.67 Several Sites of Metropolitan Importance also have statutory nature conservation designations. The level of protection afforded to SINCs should be commensurate with their status and the contribution they make to wider ecological networks. When undertaking comprehensive reviews of SINCs across a borough, or when identifying or amending Sites of Metropolitan Importance, boroughs should follow principles set out in the GLA's SINC advice note.76

5.68 The potential impact of development proposals that are adjacent to or near SINCs could include indirect effects to the site, such as noise, shading or lighting. There may 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.

5.69 The LGIF and London LNRS provide an overarching framework and evidence base for London's green infrastructure; providing spatial data across the full range of benefits that green infrastructure provides. The LNRS has informed the nature recovery element of the LGIF. The two should be considered alongside each other to fully understand the types of opportunities for nature. Plan-making authorities should make use of these as part of the evidence base for green and blue infrastructure planning and designations, including consideration of how development can contribute to delivering LNRS priorities beyond those mapped on the Local Habitat Map. Planning applicants should use this information to guide habitat creation proposals.

5.70 LNRS are spatial plans (mandated across England) designed to restore biodiversity by identifying local priorities (within the Statement of Biodiversity Priorities) and mapping key locations for nature enhancement (within the Local Habitat Map). The priorities are the 'what' and 'how', while the Local Habitat Map is the 'where'. The key layers of the Local Habitat Map (as set out by national guidance) are the areas of particular importance for biodiversity (known as 'APIB'), and areas that could become of importance for biodiversity (known as 'ACB'). BNG units delivered in either area will be subject to the 'strategic significance' uplift.

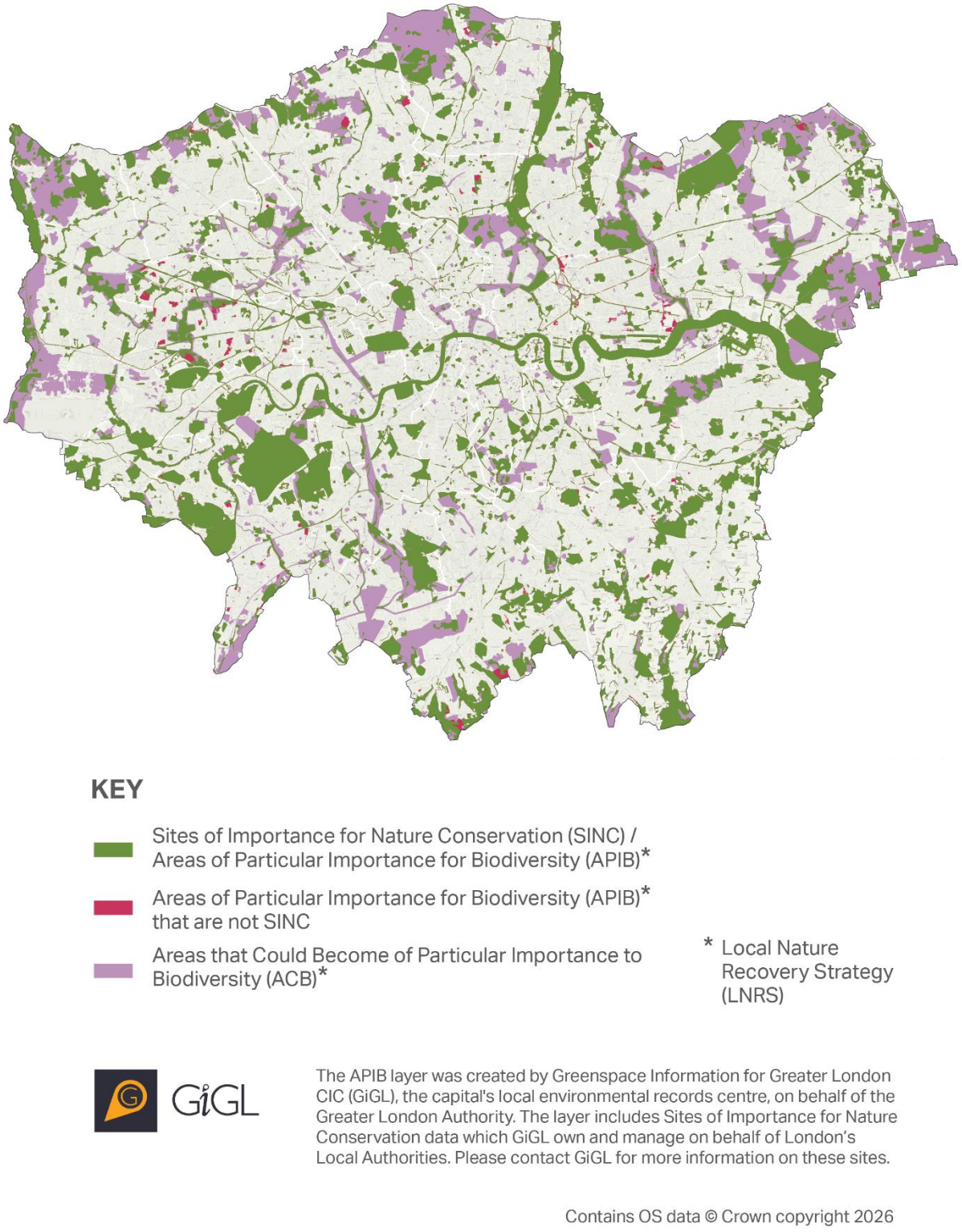
5.71 Proposals for green infrastructure and habitat creation should consider future climate scenarios in their design and species choice, for instance by including planting that is more resilient to heatwaves and drought.

5.72 London's water spaces make up an important set of habitats in London. GHR9 Clean and Healthy Waterways addresses the protection of water spaces, with a particular priority for improving and restoring them. The habitat value of waterways is a key element of their future management.

[76] See London Wildlife Sites Board - Advice Note (2026)

5.73 The London Geodiversity Partnership77 provides information about sites of geological value to help identify and conserve London's geodiversity.

Figure 5.2: Designated nature-conservation sites



[77] https://londongeopartnership.org.uk/

Rationale

This policy reflects a number of key considerations:

5.74 London has a wide variety of important wildlife habitats, including a number of sites that 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 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.

5.75 The wildlife value of these sites needs to be protected and appropriate maintenance regimes established to maintain and enhance the wildlife value of sites, recognising the additional pressure some sites may experience due to London's projected growth.

5.76 Development can bring opportunities – for example by securing, where appropriate, Improved access to wildlife sites in a way that benefits both people and wildlife, so that Londoners can better experience and appreciate the natural environment within the city.

5.77 Geodiversity is a fundamental cornerstone of Londoners' 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).

GHR7 Green Infrastructure and Urban Greening Factor

Policy aim: To secure multi-functional urban greening of sites and buildings.

Applies to: All local plans and all major development.

Locations: All.

Plan-making

A Plan-making authorities, in local plans and area-based strategies should:

(1) use up-to-date local evidence to identify key green infrastructure assets, their function and their potential function

(2) identify opportunities for strategic green infrastructure interventions to address environmental and social challenges, in line with the evidence of the LGIF and London's LNRS.

Development management

B Development proposals should respond positively to:

(3) existing green infrastructure assets, seeking to deliver enhancements to their functionality, including their connectivity and accessibility, where possible,

(4) strategic green infrastructure opportunities identified on the key diagram, and other

locally identified interventions, integrating these and connections to them in their scheme design

C Major development proposals should use the UGF to demonstrate how appropriate amounts and types of greening have been incorporated by meeting the following target scores using the factors set out in Table 5.1:

i. 0.4 for predominantly residential development

ii. 0.3 for predominantly commercial development

iii. 0.2 for predominantly industrial development

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

5.78 Plan-making authorities should use evidence, including the strategic level LGIF and LNRS and local green infrastructure strategies, to inform the identification and designation of GI assets and to identify where green infrastructure interventions can address priority environmental and social needs. Developers may also refer to this evidence where it has not yet been incorporated into Local Plans.

5.79 This should include opportunities for enhancements to existing infrastructure, better connections between infrastructure to build networks; and the development and designation of new assets.

5.80 Planning conditions or planning obligations may be used to secure management and maintenance of any proposed greening.

5.81 Applicants should use London Plan greening factors and methodology to calculate factor scores. The UGF 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.

5.82 A worked example: an office development with a 600 sqm footprint on a site of 1,000 sqm including a 600 sqm 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

5.83 Existing green cover retained on site should count towards developments meeting the target scores, based on the factors set out in Table 5.1.

5.84 In addition to a landscape masterplan, UGF calculations should be submitted as a separate stand-alone drawing and should include:

1. a UGF masterplan that is colour-coded according to surface-cover type
2. a completed UGF table.

5.85 UGF targets establish the overall quantity and quality of greening that should be

provided, applicants should use relevant information in the LGIF, London's LNRS and local green infrastructure strategies and nature recovery plans where available to identify which types of greening are particularly relevant to addressing green infrastructure priorities in the locality of the development site. For example, maximising broad-canopy trees to provide shading in areas where that experience higher heat risk, or using green sustainable drainage measures to address flood risk.

5.86 UGF and BNG approaches are complementary, and greening included as part of development will also count towards BNG requirements. These should be assessed and reported separately in accordance with relevant GLA and government guidance.

5.87 Applicants should ensure that any use of green walls complies with relevant fire safety regulations and MBUL10 Security and safety.

Table 5.1: UGF

Surface cover type	**Factor**
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site	1
Wetland or open water (semi-natural; not chlorinated) maintained or established on site	1
Intensive green roof or vegetation over structure – substrate minimum settled depth of 150mm	0.8
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	0.8
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of Green Roof Organisation (GRO) Code[78]	0.7
Flower-rich perennial planting	0.7
Rain gardens and other vegetated sustainable drainage elements	0.7
Hedges (line of mature shrubs one or two shrubs wide)	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	0.6
Groundcover planting	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[79]	0.3
Water features (chlorinated) or unplanted detention basins	0.2
Permeable paving	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone)	0

For definitions see Urban Greening Factor guidance.[80]

[78] The Green Roof Organisation code is a quality standard. See here Compliance | Green Roof Organisation

[79] Ibid.

[80] Urban Greening Factor (UGF) guidance | London City Hall

Rationale

This policy reflects a number of key considerations:

5.88 A green infrastructure approach recognises that the network of green and blue spaces, street trees, green roofs and other major assets such as natural or semi-natural drainage features must be planned, designed and managed in an integrated way.

5.89 The policy uses appropriate evidence to identify green infrastructure assets to protect along with areas for enhancement and seeks to secure multi-functional urban greening of sites and buildings.

5.90 The UGF is a tool used to evaluate the quality and quantity of natural features proposed as part of a development application, such as planting, waterbodies and green roofs, collectively referred to as urban greening. It enables developments to demonstrate how they have included urban greening as a fundamental element of site and building design in line with wider environmental objectives, notably those concerned with climate change resilience.

GHR8 Accessible green space

Policy aim: To improve access to greenspace, taking account of areas of deficiency and local green infrastructure priorities.

Applies to: All local plans and major development that introduces an increased population into an area and therefore increases the burden on existing green infrastructure or where a proposal involves any impact on designated AGS (or applicable public open space).

Locations: All designated AGS (or applicable public open spaces), as set out in borough policy maps; all locations where major new developments that create additional burden on green space proposed.

Plan-making

A When reviewing or producing local plans, plan-making authorities should:

(1) designate areas of AGS and ensure that designations are kept up to date, with new provision delivered through development formally designated and shown on local policies maps

(2) where there is justification for deviation from the national standards,[81] set local quantity standards for major developments of expected new or newly-accessible green space following a format of area (hectares) per 1000 additional daytime population/inhabitants, and reflect these in site allocations

(3) establish payment rates for off-site contributions based on the format of £/hectare that reflect local costs of AGS provision including costed enhancements, cross-boundary where necessary

(4) identify up to date Areas of Deficiency (AoDs) for both walkable and strategic scale

[81] National standards for greenspace provision are set out in Natural England's Green Infrastructure Framework.

AGS in line with the criteria set out in Table 5.2 and illustrate these areas in plans

(5) within AoDs for walkable and strategic AGS, identify specific opportunities for AGS delivery or enhancement or other strategic greening interventions that improve access to nature

(6) where there are significant cross-boundary strategic AoDs, work together with neighbouring authorities to identify opportunities for new strategic-scale AGS and, where appropriate, pool financial contributions or other spatial opportunities to help deliver it.

Development management

B Developments should not result in a net loss of designated publicly accessible green space.

C All additional, re-provided or newly-accessible green space should be designed to help address open space and green infrastructure priorities identified locally or within the LGIF, and should have maintenance and management plans secured that align with the Public London Charter.

D Major developments that generate an increased demand on existing public open space should contribute towards the provision of additional AGS to meet the needs of the development in line with locally set quantity standards. In doing so:

(1) on-site provision to meet local standards should be prioritised, particularly in AoD for walkable AGS (as defined locally or figure 5.3 where no local mapping exists)

(2) where it is accepted that full standard-consistent provision cannot be delivered on site, ring-fenced off-site contributions should be secured:

i. firstly to support new provision where opportunity to address shortfalls has been identified within the neighbourhood catchment area

ii. otherwise, to help deliver other prioritised green space enhancements identified in Local Plans or in discussion with the plan-making authority.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

5.91 Local plan public open-space designations may be updated to clarify which areas meet the AGS definition set out in the glossary, while civic spaces and other areas of public realm may still retain designation as public open space.

5.92 Natural England's Green Infrastructure Framework will be a useful starting point for considering whether local standards are needed and if so how to derive them.[82] The GLA will also work to support boroughs with this during plan-making. Local AGS standards may apply not only to residential, but also to other major uses, such as offices, healthcare and visitor facilities that significantly increase daytime or residential populations.

[82] For example see Natural England Accessible Greenspace Standard user guide 2024

5.93 Quantity standards for AGS should be separate to requirements for dedicated play-space (see HN8 Housing design) and sports provision, although all such types of infrastructure may often be delivered in a spatially integrated manner. Where a borough includes land within the zone of influence of a designated Special Area of Conservation, such as Epping Forest, quantity standards, site allocation specifications and off-site contribution rates may require adjustments to account for the need for Suitable Alternative Natural Greenspace (SANGs). It may be particularly important to maximise areas of semi-natural greenspace and consider connections to existing SANGS where appropriate.

5.94 In places with limited opportunities for new recreational AGS, enhancements relevant to this policy could include other forms of multi-benefit greening, such as SuDS, street trees, or planting and other improvements to walking and cycling routes or existing (less green) public open space. Improvements to the connectivity of green spaces (including cross-boundary) may also be beneficial, which can also support low cost active travel, offer places for rest and contribute to wildlife corridors. This may partly be achieved through the Healthy Streets approach set out in Policy MBUL9 or as part of the regional parks opportunities highlighted on the environment sub key diagram. The LGIF may help identify local priority intervention types.

5.95 Table 5.2 sets out categories of AGS according to scale and establishes standardised proximity criteria for boroughs to use when assessing deficiency, grouping AGS into two Area of Deficiency (AoD) categories; walkable and strategic. AGS that is of metropolitan significance, has the potential to meet the Metropolitan Open Space (MOL) criteria and so may be designated accordingly. Determination of which designation is the most suitable for a site will depend on its characteristics and significance (see PV6 Metropolitan Open Land (MOL)). Many publicly accessible MOL sites will contribute towards a local area's open space needs and should be incorporated into calculations for AoD. Figure 5.2 illustrates the current extent of these areas, which will change over time as new spaces are created, public access is expanded or data is improved, hence the requirement to update these during plan-preparation.

Table 5.2: Public green space categories and access criteria

Green space category	**AoD category**	**Size threshold**	**Proximity criteria**
Pocket	Walkable	0.02 – <0.2 ha	100m
Small	Walkable	0.2 – <2 ha	200m
Local	Walkable	2 – <10 ha	400m
Neighbourhood	Walkable	10 – <20 ha	800m
District	Strategic	20 – <60 ha	1.2km
Metropolitan	Strategic	60 – 400 ha	3.2km
Regional	Strategic	+ 400 ha	8km

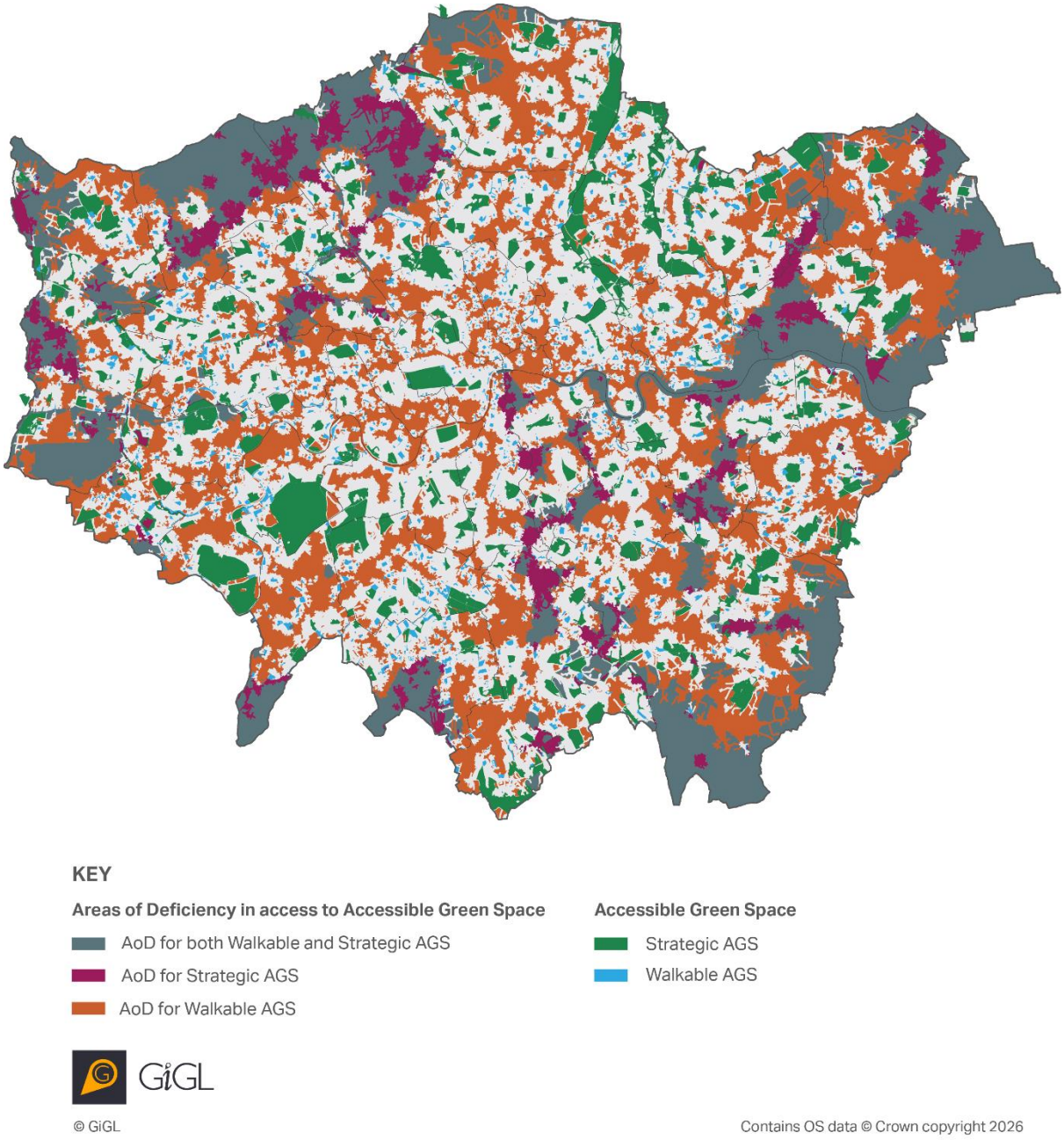


Figure 5.3: London-wide areas of deficiency for walkable and strategic AGS

Rationale

This policy reflects a number of key considerations:

5.96 All types of green space are valuable in connecting Londoners with nature; some are more accessible than others, and their size and catchment varies considerably. A focus upon AGS reflects the critical value that access to nature plays for Londoners' health and wellbeing.

5.97 The policy is designed to provide a London-wide consistent approach to improving (and monitoring) AGS provision while allowing for some local variation as per the NPPF. This should help to make expectations clearer for developers, while acknowledging the significant amount of cross-boundary provision and use in London, and more limited scope for certain types of provision in some areas relative to others. The focus is on AGS rather than public open space more generally, due to the importance of urban greening as part of Good Growth objectives (such as those linked to health, resilience and wider environmental objectives). Ensuring appropriate long-term management is essential to maintain these benefits and limit conflicts between different uses.

GHR9 Clean and healthy waterways

Policy aim: To help secure clean and healthy waterways that positively contribute to London's recovery, health, resilience, inclusivity, character and identity.

Applies to: All developments with a spatial or functional existing or potential relationship with one of London's waterways.

Locations: Across London.

Plan-making

A Local Plans should seek to enhance the cleanliness, health and accessibility of London's waterways and the role they play in London's wider identity and good growth by:

(1) integrating relevant Clean and Healthy Waterways strategic locations (Environmental Opportunity Areas) into spatial policies and site allocations to support delivery of those opportunities

(2) ensuring that polices support waterways in their area becoming more visible, accessible and positively integrated with development in ways that improve their openness and multi-benefits, including through:

iii. designating Thames Policy Areas and incorporating relevant elements of Joint Thames Strategies

iv. in respect of the River Thames, reflecting the 10 Riverside Strategy principles set out in Box GHR9.

Development management

B Development proposals should:

(1) where referable, demonstrate use of a water quality assessment using the Simple Index Approach to inform scheme development and mitigation measures, including selection of SuDS that will be implemented to improve water quality

(2) take action to minimise the potential for misconnections between foul and surface-water networks, in line with MBUL4 Utilities – capacity, connectivity and resilience

(3) conserve and enhance the distinct open character and heritage of waterways and their settings, including through reflecting any relevant Joint Thames Strategy and avoiding permanent encroachment into waterways except where C(4) applies

(4) ensure sufficient space is provided between developments and London's waterways

to provide natural corridors, as well as easy access for maintenance, flood risk management; and ensure the integrity and future proofing of defences where necessary

(5) provide safe and inclusive access to and along the waterway frontage including through the protection of existing access points and/or the creation of new and inclusive points of access enabling all Londoners to engage with water in, on, and along waterways, while carefully managing impacts on biodiversity

(6) protect and enhance existing moorings and supporting infrastructure where compatible with other criteria.

C Development proposals for new or expanded moorings, including permanently moored vessels should:

(1) be offline from main navigation routes, in basins or docks unless there are negative impacts on navigation or other criteria

(2) be compatible, including through their management with the criteria in part B (3)-(6)

(3) use onshore clean power wherever possible in line with GHR1, and wash mitigation where necessary

(4) other than residential moorings, enable or enhance water-related uses.

Box GHR9

Riverside strategy principles (aligning with Thames Estuary 2100 requirements):

1. Engage with the local community so that plans for the riverside consider their needs.
2. Engage with neighbouring sites or authorities to ensure that the flood defence line is continuous.
3. Include Thames Estuary 2100 height and deadline requirements for upgraded flood defences.
4. Include redesigning defences so that upgrades will improve the local area and make it greener.
5. Identify land that will be required for future defence improvements and ensure this land will be available when needed.
6. Provide space for habitat, work on defences and access to the river.
7. Set out your approach to sustainability, nature recovery, and biodiversity and environmental net gain.
8. Identify opportunities to create and enhance intertidal habitat.
9. Enable people to have uninterrupted access to the riverside with views of the river.
10. Include measures for the Thames Path to run continuously throughout the estuary.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

5.98 The term 'waterways' refers to the River Thames, its tributary and other rivers and canals, and also to other water spaces including docks, lakes ponds and reservoirs.

5.99 The emerging Clean and Healthy Waterways Plan has identified strategic locations for water quality and accessibility improvements, which are reflected within the environmental opportunity areas in the London Plan.

5.100 Setting boundaries for the Thames Policy area should be done in consultation with neighbouring boroughs, including those across the river. When defining boundaries, consideration should be given to the following criteria:

- proximity to the Thames
- clear visual links between areas, buildings and 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

5.101 The Simple Index Approach should be used to inform the design of the SuDS strategy for the site, (required as part of compliance with GHR5 Flood risk and drainage and national policy) ensuring that this component meets the pollutant hazard levels of the site.

5.102 Where possible, development proposals should seek to improve and expand the Thames Path and towpaths; improve connections to slipways and historic steps; and develop better linkages to the transport network and water sports centres. With improved access however, impact on habitats and wildlife may need more deliberate management and mitigation.

5.103 To protect the openness of waterways, they should not be used as an extension of developable land in London, nor should parts be a continuous line of moored craft. Infrastructure that supports moorings and related active use of the water may include boatyards for the maintenance of houseboats and other vessels.

Rationale

This policy reflects a number of key considerations:

5.104 London's waterways are multi-functional assets that provide a range of environmental, economic and health and wellbeing benefits for Londoners, as well as contributing to London's character and identity. However, London's waterways have been neglected and damaged by pollution, with access and enjoyment of them constrained by multiple factors.

5.105 As London's waterways cross borough boundaries, the policy seeks to ensure that they are managed strategically, taking into account relevant Plans and Strategies. In particular, the policy embeds the planning levers of the Mayor's Clean and Healthy Waterways plan and the Joint Thames Strategies, which address the issues in a holistic way, also seeking to make waterways climate resilient.

5.106 London's waterways are also home to some Londoners. The policy sets the parameters in which residential development on waterways should be considered.

GHR10 Air quality

Policy aim: To ensure new developments help improve local air quality, reduce the extent to

which Londoners are exposed to risks associated with air pollution and poor air quality and work towards meeting the World Health Organizations (WHO's) air-quality guidelines.

Applies to: All developments.

Locations: All locations.

Plan making

A Plan-making authorities should use the latest available evidence regarding poor air quality, vulnerability and exposure to:

(1) review areas of concern, identifying new ones on their policies map as appropriate;

(2) identify prioritised interventions that will help reduce emissions or exposure that can be secured through planning mechanisms

(3) inform site allocations and area-based approaches in order to plan for air quality improvements and exposure reduction at a neighbourhood scale in a way that integrate on and off-site measures and with relevant Air Quality Action Plans.

Development management

B Demolition, construction and ongoing operations deploying non-road mobile machinery (NRMM) should be planned to minimise dust and plant emission impacts, including through meeting the requirements of the NRMM Low Emission Zone (LEZ) as per Box GHR10

C In identified areas of air quality concerns, Air Quality Assessments (AQA) should be undertaken iteratively from an early stage, to inform the optimisation of the design of major schemes to reduce emissions and exposure in line with the policy aim

D All development proposals that could have operational (transport and/or building plant) air quality impacts should be demonstrably at least AQN. In doing so:

(1) design and on-site solutions to address and minimise contributions to poor air quality should be prioritised

(2) where relevant, emissions from generators should be minimised by meeting EU Stage V emissions standards as a minimum or demonstrate equivalent emissions performance from start-up using approved abatement technology as needed.

E Development proposals that are subject to an Environmental Impact Assessment that includes air quality within its scope should contribute to additional air quality improvements proportionate to their scale and impact. This means they should seek to deliver the objectives of the policy aim by demonstrably going beyond relevant AQN benchmarks through:

(1) integrating additional local plan priority and applicable area-based air quality interventions within the scheme; or, where these are not specified;

(2) incorporating features that support wider emissions reduction and concentration dispersal, complementing strategic interventions, and

(3) incorporating measures that appropriately reduce exposure to poor external or

external air quality.

Box GHR10

Compliance with the NRMM LEZ is required for all development sites within Greater London. All NRMM of net power of 37kW and up to and including 560kW present on site (including machinery not in use) used during the course of the demolition, site preparation and construction phases shall comply with the emission standards as published on the GLA's (https://nrmm.london/) Each machine within this range must also be registered on the GLA NRMM register prior to or upon arrival on site. These standards will be based upon engine emissions standards set in EU Directive 97/68/EC (the Directive) and its subsequent amendments including Regulation (EU) 2016/1628.

The requirements as of 1st January 2025:

NRMM used on any site within Greater London will be required to meet Stage IV of the Directive as a minimum.

From 1st January 2030 the following will apply

NRMM used on any site within Greater London will be required to meet Stage V of the Directive as a minimum.

From 1st January 2040 the following will apply

NRMM used on any site within Greater London will be required to be zero emission.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

5.107 The Mayor has an adopted Environment Strategy which includes objectives for air quality in London. In line with that Strategy, where this policy refers to poor air quality this is defined in relation to the fourth interim WHO guideline for PM2.5 ($10_{ug}/m^3$) to be achieved by 2030 and national air quality objectives for PM10 and NO2[83]. In light of WHO Guidelines 2024, London's Mayoral ambition is to continue to reduce harmful emissions and exposure to them beyond current statutory air quality objectives so as to reduce the risk of harm to human health and protected habitats.

5.108 Where the policy refers to "areas of concern", these include Air Quality Management Areas (AQMAs), which are defined in relation to national legal limits (and by agreement may also reflect the higher (Mayoral) WHO air quality guidelines where national limits are now met); and the CAZ. Additional areas of concern may be identified by Local Plans. These may relate to habitat vulnerabilities to air pollutant deposition at particular levels (for example in Epping Forest SAC) and may also include areas where current pollution levels are within 5 per cent of national limits of WHO air quality guidelines.

5.109 The evidence to review in plan-making includes (but is not limited to) the latest London Atmospheric Emissions Inventory, Habitats Regulations Assessments, and information on

[83] UK Air Quality Limits - DEFRA UK Air - GOV.UK

health inequalities relating to air quality. Cumulative and in-combination effects of proposed and recent development should also be considered, as should opportunities relating to the scale of development in a particular area. Vulnerability and exposure can also be affected by particular pollution pathways, street canyon effects and habitat sensitivities as well as sensitivities of particular populations or communities including those with protected characteristics.

5.110 As part of the work to identify prioritised interventions in response to these areas of concern, TfL and the GLA will work with boroughs on mitigation strategies to ensure that new housing and employment development planned does not result in adverse air quality impacts on Epping Forest SAC alone or in combination with other plans and projects.

5.111 In areas of concern, a preliminary AQA should draw on similar, up-to-date evidence. It should identify the most significant sources of air pollution in the area, and likelihood of it being worsened by the development individually or in combination with others. Assessment of the likely air-quality impacts of a scheme should reflect fixed plant such as boilers and emergency generators, as well as expected construction and transport-related sources, and all relevant pollutants emitted. Industrial, waste and other working sites may additionally need to include assessments of on-site vehicles and mobile machinery.

5.112 Further assessments should then be carried out as the design evolves, iteratively in response to this evidence, to ensure that impacts from emissions are prevented or minimised as far as possible. The expected effect of any proposed mitigation measures and any remaining emissions should be fully quantified in order to assess their significance in relation to policy aims. The minimum expectation is that development must not cause new exceedances of national limits and , in locations where national limits are currently exceeded, must not delay the date on which those limits will be attained. Mitigation measures should be secured as part of the consent, and be in place prior to occupation.

5.113 Responses to poor air quality sought by policies and/or incorporated in proposals should be informed by plan-making, evidence-based assessment and good practice guidance.[84] They may relate to design transport and access, suitable uses/use mix, landscaping and management/operational practices. In some cases, they may involve retrofit of existing buildings such as schools and hospitals to address exposure, (e.g. through the installation of air filters), which may be funded by developer contributions, or otherwise secured by the consent process. Development proposals' responses should reflect all approaches and prioritised interventions established in the Local Plan.

5.114 Operational emissions impacts can be expected to arise from the introduction of new motor vehicle parking, combustion plant (e.g. gas-fired boilers) or where the proposal is likely to generate increases in motor vehicle movements. It will be for the LPA to determine where no operational emissions impacts are expected and to confirm whether an AQN assessment is needed, and its scope.

5.115 An AQN development is one that, at least, meets the most up-to-date AQN benchmarks[85]. AQN Assessments should be prepared in accordance with latest guidance and may form part of wider AQAs where those are needed. Achieving AQN in most cases

[84] This currently includes Air Quality Positive Guidance and that signposted in the practice note 'Control of Dust and Emissions'

[85] AQM benchmarks can currently be found within Air Quality Neutral LPG.

will serve to demonstrate that the development is minimising emissions in line with policy aims. However, where relevant other emissions impacts will need to be addressed as part of an AQA (where required) such as those from HGV movements and construction.

5.116 Emissions from backup generators should be included as part of AQN assessments, where these are not used exclusively to provide power during emergencies and for life-safety purposes. An 'emergency' is any situation in which a generator is required to maintain the continuous operation of essential systems due to the failure or interruption of the primary electricity supply or to ensure life-safety. In relation to emissions standards for generators, retrofitting with emissions abatement technologies is permitted, provided the technologies are either recognised by the Energy Saving Trust[86] for NRMM engines or demonstrably achieve equivalent reductions for stationary plant. Alternative but related requirements for data centre back-up generators are set out in GLE3 Data Centres.

5.117 Where a development does not as originally proposed achieve AQN, additional mitigation measures will be required in line with the AQN guidance. Further measures necessary to demonstrate additionality where stipulated, (criterion E) are suggested in the Air Quality Positive guidance and should be documented[87]. Reference to strategic interventions means policies and plans implemented by the Mayor, TfL, or the government that have beneficial air-quality impacts by managing vehicular use, mode choice and energy use.

5.118 Offsetting payments should only be considered acceptable in situations where on-site mitigation measures have been explored, exhausted and otherwise found to be insufficient or unachievable. Calculations should follow the formula set out in guidance, with funds raised expected to be ring-fenced to be used for priority air quality improvements identified in local plans and related schemes.

Rationale

This policy reflects a number of key considerations:

5.119 The policy sets out a strategic approach to air quality improvement across London, in light of considerable health impacts and inequalities that arise from poor air quality and the Mayor's ambitions to tackle this robustly as originally established by the London Environment Strategy. These ambitions and approach are underpinned by the WHO air quality guidelines which are an evidence-based assessment which identify harm to human health at levels below existing national air quality objective levels. However the approach is also necessary because of expected significant effects associated with growth on habitats of international significance (notably Epping Forest SAC), which may be harmed by nitrate and ammonia deposition primarily from increased transport movements. These must be reliably mitigated to ensure compliance with the Habitats Regulations.

5.120 The approach identifies areas of concern and development types that present most risk to emissions reduction. The AQN approach seeks to address expected emissions to minimise that risk to a level compatible with air quality objectives, while area-based approaches and the additional ask of larger (EIA-able) schemes (which is what is known as the 'Air Quality Positive' approach seeks to work with both the opportunity and risk of larger developments to further minimise emissions and reduce cumulative negative impacts. The broader AQA requirement additionally addresses impacts from sources such as HGVs and construction.

[86] Non-road mobile machinery certification - Energy Saving Trust
[87] For example, as part of the design and access statement, or AQA where required

5.121 As a London-wide approach it supports certainty over expectations for developers and magnifies overall impact, coordinating management across different AQMAs while reflecting their consistent objectives. The overall approach is now well-established, with 75 per cent of required developments presenting as AQN at submission, helping to secure, with the ULEZ and overall technological change, national air quality objectives being achieved in most places. Given this, and the evidence from WHO Air Quality Guidelines that adverse health impacts occur at levels below existing national air-quality objectives, together with the Mayor's duty to address health inequalities through the London Plan, it is considered that a policy seeking to reduce emissions is justified. Additional policy requirements which are already partially required as part of the NRMM LEZ are cost-effectively incorporated when considered at an early design stage, as the policy requires; and addresses harmful pollution spikes associated with construction sites and back-up generator testing.

GHR11 Cycle and Car Parking

Policy aim: To facilitate cycling and limit car parking in new development to reduce car use and enable optimisation of sites.

Applies to: All development.

Locations: All locations.

Development management

A Development proposals should provide cycle parking that is fit for purpose, secure and well-located. The area required for it, its location and access to it should be considered at the initial design stage. Applicants should demonstrate that there is sufficient space for the number of parking spaces required.

B The design and layout of cycle parking areas should provide sufficient spacing between stands, the right type and mix of stands (including for larger cycles), and accessible, step-free access routes. The design, layout and the provision of associated facilities should be in accordance with the London Cycling Design Standards.[88]

C Residential development should provide at least the number of long-stay cycle parking spaces set out in Table 5.3. Non-residential development should provide long-stay cycle parking spaces for at least the percentage of staff set out in Table 5.4 and the number of students or pupils in Table 5.5.[89]

D Development should provide at least the number of short-stay cycle parking spaces required by Tables 5.6 and 5.7. Where uses are not listed in Tables 5.6 or 5.7, the level of provision should have regard to:

(1) borough or local cycle mode share for relevant trip purposes

(2) anticipated demand

(3) Transport for London and national guidance such as chapter 11 of Cycle

[88] Streets planning & design - Transport for London

[89] Homes & Communities Agency, November 2015, 'Employment Density Guide: 3rd Edition'.

Infrastructure Design.[90]

E If developments cannot provide all the cycle parking required by parts C or D on site, they should provide a proportion in alternative locations, through alternative forms of provision or through contributions to this, subject to borough approval. This may be particularly appropriate in locations with high demand but limited space for cycle parking, such as town centres. The different types of provision should have regard to the need to encourage cycle ownership for different groups of people as well as considering the site's use and constraints. Alternative locations and provision could include:

(1) secure and enclosed, on-street (in the carriageway) parking, if the borough can identify suitable location

(2) secure cycle parking areas that serve multiple developments or a town centre

(3) space, infrastructure or both for public hire cycles, either within the curtilage of the development site or in the carriageway

(4) managed on-site shared cycles, made available in perpetuity for residents or staff.

F Development should provide space, infrastructure or both for TfL's cycle-hire scheme and for other public-hire cycle and scooter schemes, where the development is in areas near to, or already served by, those schemes. The design of this space and infrastructure should be in accordance with any relevant TfL guidance.

G Stations should provide cycle parking spaces, with the level of provision reflecting the type and location of the station, existing and forecast rail and cycle demand, and the potential for journeys to and from the station to be made by cycle.

Table 5.3: Minimum number of spaces required for residential long-stay cycle parking, by band[91]

Use	Band 1 and 2 and BFOAs	Band 3	Band 4
Dwelling: Studio or one bedroom	1.0	0.9	0.7
Dwelling: Two-bedroom	1.5	1.3	1.2
Dwelling: Three-bedroom or more	1.9	1.6	1.5
Bedroom in LSPBSL accommodation	0.7	0.6	0.5
Bedroom in PBSA	0.7	0.6	0.5

Table 5.4: Percentage of full-time equivalent staff to be provided with long-stay cycle parking spaces, by band[92]

Band 1 and BFOAs	Bands 2 and 3	Band 4
15.0	10.0	7.5

[90] Department for Transport, July 2020, 'Cycle Infrastructure Design: Local Transport Note 1/20', available at https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120.
[91] A map of bands is shown in Figure 5.6.
[92] ibid.

Table 5.5: Percentage of full-time equivalent pupils or students to be provided with long-stay cycle parking spaces, by band[93]

Use	All locations
Primary or secondary school or sixth form college	12.5
University	5.0

Table 5.6: Number of short-stay cycle parking spaces to be provided for visitors of residential development, by band[94]

Use class	Use class summary description	Threshold	All locations
C3	Dwellings	For 5 to 40 dwellings	2 spaces
C3	Dwellings	Thereafter	1 space per 40 dwellings

Table 5.7: Number of short-stay cycle parking spaces to be provided for customers and visitors of non-residential development, by band[95]

Use class	Use class summary description	Threshold	Bands 1 and 2 and BFOAs	Band 3	Band 4
E(a), (b) and (c)	Shops, services, and sale of food or drink	First 1,000 m² NIA	1 per 70 m² NIA	1 per 110 m² NIA	1 per 160 m² NIA
E(a), (b) and (c)	Shops, services, and sale of food or drink	Thereafter	1 per 135 m² NIA	1 per 180 m² NIA	1 per 225 m² NIA

H Car parking should be minimised, including as needed to optimise the use of a site or to mitigate impacts on the local road network. Car-free and car 'lite' development should be the starting point for development proposals (apart from disabled persons' car parking which should still be provided in accordance with parts J and K). If a need for car parking for a development is identified, the use or control of existing on-street, other public or shared parking should first be considered. At SAM 4 and below, developments should provide for car clubs where they can support car 'lite' development and be provided on-street only.

[93] ibid.
[94] A map of bands is shown in Figure 5.6.
[95] Ibid

I If car parking is provided, it should not exceed the maximums in Tables 5.8 and 5.9[96] [97] (and, for Green Belt sites, the maximums in policy PV7 Sustainable development and enhancement of the Green Belt). At residential development exceeding the top of the density range in the Optimisation Framework, provision should be proportionately lower than the maximum standard. Employment uses should have regard for the office standards while accounting for differences in employee densities. If uses are not listed in Tables 5.8 or 5.9, the amount of car parking provided should be assessed against part H, but other residential uses and all uses in SAM 5, or in metropolitan or major town centres, should be car free. If supermarkets exceeding 280sqm are re-provided as part of a development, car parking should be substantially reduced from the existing quantum. If other sites are redeveloped, car parking should not be re-provided at levels that would exceed the maximums in Tables 5.8 and 5.9.

Table 5.8: Maximum car parking spaces per dwelling for Use Class C3

Sustainable Access Level	**1**	**2**	**3**	**4**	**5 and met/ major centres**
Settings A and B	1	0.8	0.6	0.4	0
Settings C and D	0.8	0.6	0.4	0.2	0
Settings E and F and BFOAs	0.6	0.4	0.2	0	0

Table 5.9: Maximum car parking spaces for office and retail uses

Use / Location	**SAM 1-2**	**SAM 3-4**	**SAM 5 and met/major centres**
Office outside of BFOAs	1 per 75 m² NIA	1 per 150 m² NIA	0
Office within BFOAs	1 per 300 m² NIA	0	0
Retail outside of BFOAs	1 per 40 m² NIA	1 per 60 m² NIA	0
Retail within BFOAs	1 per 70 m² NIA	1 per 70 m² NIA	0
Hotel and leisure uses outside of BFOAs	Case by case	Case by case	0
Hotel and leisure uses within BFOAs	Case by case	Case by case	0

J Residential development should enable residents who hold Blue Badges to access disabled persons' car parking spaces. At developments with on-site car parking, one disabled persons' car parking space per dwelling should be available from the outset for 3 per cent of dwellings. At otherwise car-free development, boroughs should designate on-street car parking spaces as they become required. If there is no suitable on-street space in proximity then on-site provision, designated from the outset, should be made, with the level of provision informed by an assessment of need (including assessment of local Blue Badge holding, Blue Badge parking availability, and the existing level of and potential for

[96] In Tables 5.8 and 5.9 spaces for motorcycles and (if development is not otherwise car free) disabled persons' parking count towards the maximum; at car-free development, disabled persons' parking does not count towards the maximum; and Sustainable Access Levels should be those that take into account future known and likely improvements.

[97] Where more than one standard applies, the more restrictive standard should be applied. Where Development Plans specify lower local maximum standards for car parking at any land use, these should be followed.

contributions to accessible active and public transport).

K Disabled persons' parking should be available for new non-residential development. At developments with on-site car parking, this should be provided in accordance with section 8.2 of 'Inclusive Mobility'.[98] At otherwise car-free development, existing provision in the vicinity should be considered first, and, where this is deemed insufficient, provision should be informed by an assessment of need (including assessment of Blue Badge holding, Blue Badge parking availability, and the existing level of and potential for contributions to accessible active and public transport).

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

Cycle parking

5.122 For calculating the cycle parking non-residential requirement where the number of staff is not known at the time of application, reference could be made to the density matrix of the 'Employment Density Guide'[99] or other evidence. For offices, however, one member of staff per 15 sqm of net internal area should be assumed, which is consistent with the London Employment Sites Database 2024[100] assumption of one member of staff per 10 square metres at a 66 per cent mid-week peak utilisation rate. Where the mix of E class uses is not known, the most likely mix of office, retail and light industrial uses could be used for the calculation.

5.123 Whether it would be acceptable to provide less than the required minimum parking should be considered in the balance of site constraints and impacts on design, such as the following:

- Avoiding the need for a basement (or additional basement level) or other design requirements that materially improve viability
- A small building footprint relative to overall floorspace
- The density or scale of development generates a very large requirement, and this has a disproportionate effect on requiring what could otherwise be lettable or saleable floorspace.

Car parking

5.124 Provision for car clubs at SAM 4 and below should be considered with reference to SAM scores, Public Transport Access Levels (PTAL) and any other appropriate local evidence of connectivity. The level and design of provision should not add to the vehicle dominance of street environments or undermine the effectiveness of car 'lite' development.

[98] Department for Transport, December 2021, 'Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure'.
[99] Homes & Communities Agency, 'Employment Density Guide', 3rd edition, November 2015.
[100] GLA, London Employment Sites Database 2024, March 2026, available at London Plan Evidence | London City Hall

5.125 The Department for Transport's 'Inclusive Mobility' guidance,[101] guidance on building regulations[102] and 'BS 8300-1'[103] set out guidance on the design of disabled persons' parking.

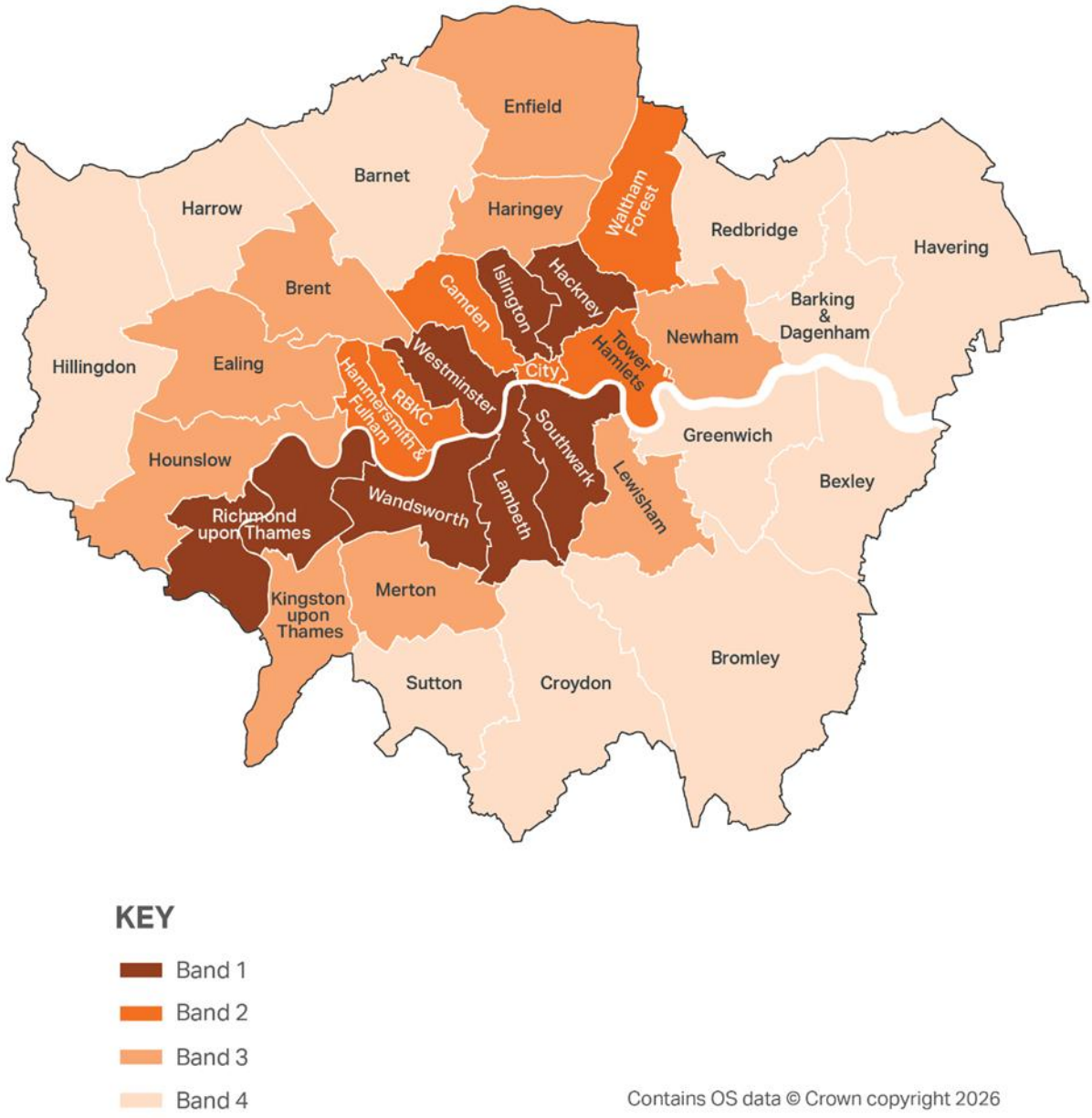


Figure 5.4: Cycle parking bands map

Rationale

[101] 'Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure' (December 2021), section 8.
[102] Available at Access to and use of buildings: Approved Document M - GOV.UK.
[103] British Standards Institution, 'BS 8300-1:2018: Design of an Accessible and Inclusive Built Environment: Part 1: External Environment—Code of Practice' (2018).

Cycle parking

5.126 Quality cycle parking enables cycle ownership, which is a key factor in enabling and encouraging more Londoners to cycle, alongside other models e.g. cycle hire. This contributes to the increased use of sustainable modes of transport, and the core objective of the Mayor's Transport Strategy to support mode shift. It also contributes to Healthy Streets indicators, the health of Londoners and a range of other objectives. The minimum standards provide for current ownership and use, while also allowing for room for growth in cycling.

Car parking

5.127 As London continues to grow, restrictions on car parking are required to limit car use so that congestion on London's roads can be managed. It is also a fundamental requirement for making the best use of land and accommodating more homes and growth than would otherwise be possible.

6 Place visions and place-based approaches

Reasoned justification for chapter 6

6.1 This section provides a strategic framework for places in London that require particular approaches to development and change in light of the Plan's Good Growth objectives and the overall spatial strategy. Many of these are the parts of London that will see the most significant development over the lifetime of the Plan, representing key strategic opportunities. Most of the places (also) have sensitivities to development that must be navigated, reflecting their value as existing place assets. The value of such places has been clearly articulated by the public and other stakeholders as part of engagement and consultation in the plan-preparation period, as well as in the London Growth Plan.

6.2 The first part of the chapter focuses on key places within the existing urban extent that are important reservoirs of growth potential. BFOAs highlight areas where that reservoir of housing and/or economic potential has long been identified but which will need extra attention and intervention to bring it forward. The CAZ, town centres and other strategic economic clusters are recognised as important engines of economic growth and prosperity. Many town centres and high streets present particular intensification and adaptation opportunities that can also yield significant additional housing as they evolve as places.

6.3 Some of the more accessible (by public transport) industrial land is a further reservoir of housing potential. This needs to be balanced against characteristics that contribute to economic and infrastructure needs and the growth associated with these expected by policy GLE2 and the NPPF. A plan-led approach to release is set out to reflect and support this.

6.4 The role of MOL in providing vital breathing spaces, cultural interest, water management and wildlife corridors is of the utmost importance to Londoners. This is especially important alongside the wider drive for intensification. This justifies the highest levels of protection, as set out. This recognises some potential for a plan-led process to optimise that role through a review of boundaries and coverage where particular strategic opportunities are identified.

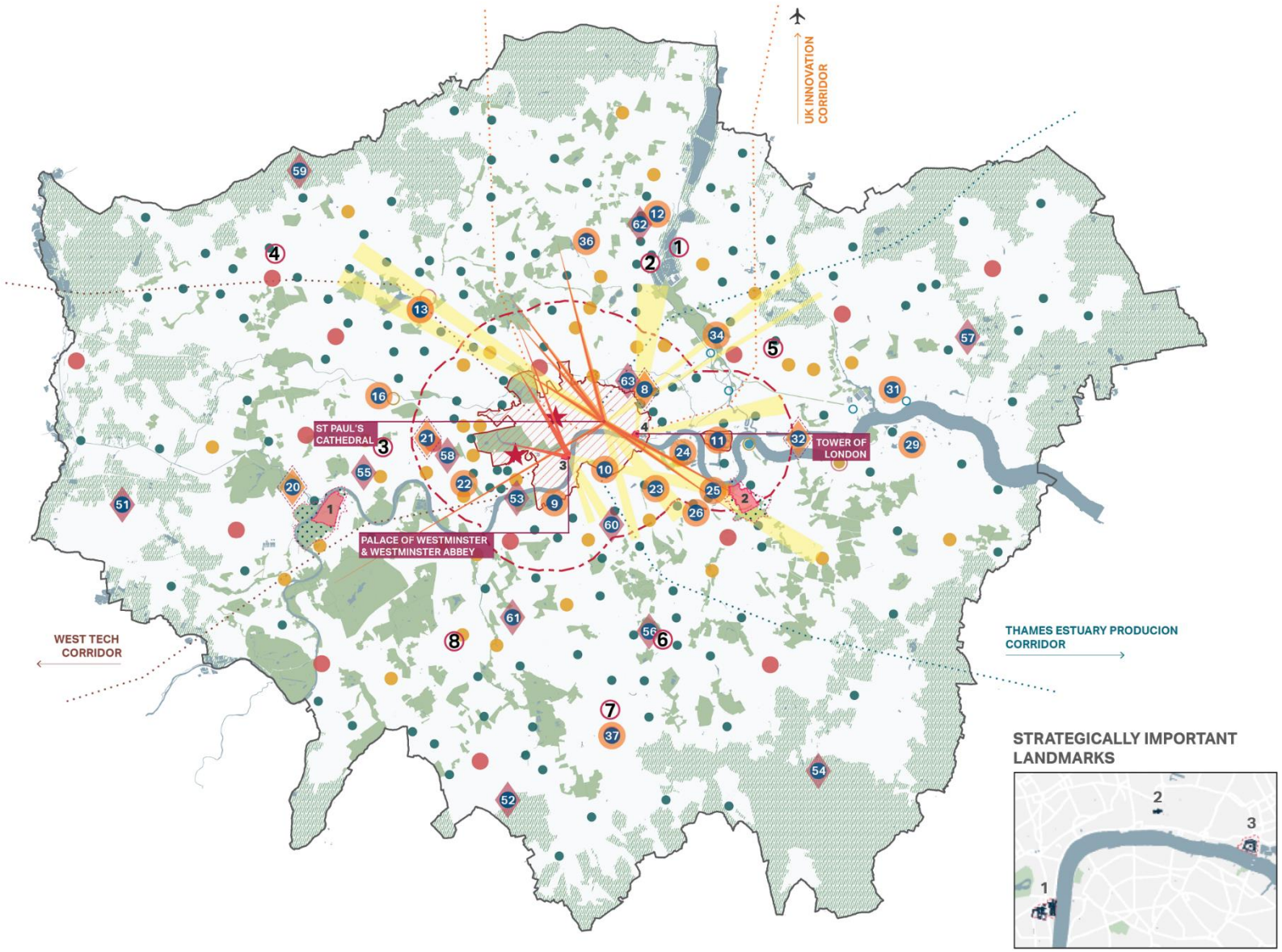
6.5 The NPPF articulates a policy framework for Green Belt and the policies in this chapter set out how this should be taken forward specifically within the London context in order to help accommodate needs (that cannot wholly be met in the existing urban extent) in the most sustainable way. This is necessary to address the impacts on infrastructure and the environment that must be carefully managed. Without this focused approach to Green Belt release, London will not be able to deliver the scale of housing set out in this Plan nor manage the adverse impacts that would otherwise result from a more disparate and lower density grey-belt approach. The Mayor is clear that the development that comes forward must be focused on creating affordable, well-connected neighbourhoods with densities that support public transport and they must provide new and/or improved AGS as part of a landscape-led approach.

6.6 The chapter also sets out the approach to managing London's views and the settings of

internationally significant heritage assets which also contribute so much to the overarching experience of London as a place.

6.7 The sub-key diagram illustrates the Places policies spatially, but should be read in conjunction with the key diagrams and infrastructure sub-key diagram in chapter 2 and other thematic sub key-diagrams in chapters 3-5. Some of the policies are also accompanied by more detailed map-diagrams.

Figure 6.1: Places sub key diagram


UK INNOVATION CORRIDOR
ST PAUL'S CATHEDRAL
TOWER OF LONDON
PALACE OF WESTMINSTER & WESTMINSTER ABBEY
WEST TECH CORRIDOR
THAMES ESTUARY PRODUCION CORRIDOR
STRATEGICALLY IMPORTANT LANDMARKS
1
2
3

KEY

- Metropolitan Open Land (MOL)
- Green Belt

Strategic Economic Corridor

- UK Innovation Corridor
- Thames Estuary Production Corridor
- West Tech Corridor

Town Centres

- International
- Metropolitan
- Future Metropolitan
- Major
- Major (Future Metropolitan)
- Future Major
- District
- District (Future Major)
- Future District

BLG: Central Activities Zone (CAZ) inc. Northern Isle of Dogs (NIOD)

- CAZ 3km Buffer ** Industrial release exclusion criterion – others listed in Policy PV5(A).*

BLG: Brownfield First Opportunity Areas (BFOAs)

8 City Fringe/Tech City*
9 Vauxhall, Nine Elms and Battersea
10 Elephant and Castle
11 Isle of Dogs and South Poplar
12 Lee Valley
13 Brent Cross/ Cricklewood/Staples Cr
14 Harrow and Wealdstone
15 Wembley
16 Old Oak/Park Royal
17 Kensal Canalside
18 Hayes
19 Southhall
20 Great West Corridor*
21 White City*
22 Earl's Court/West Kensington*
23 Old Kent Road
24 Canada Water
25 Deptford Creek/ Greenwich Riverside
26 New Cross - Lewisham - Catford
27 Greenwich Peninsula
28 Charlton Riverside
29 Thamesmead and Abbey Wood
30 Bexley Riverside
31 London Riverside
32 Royal Docks and Beckton Riverside*
33 Poplar Riverside
34 Olympic Legacy
35 Ilford
36 Wood Green
37 Croydon

**BFOAs marked with an asterisk are also strategic economic clusters and shown with an orange diamond.*

BLG: Strategic Economic Clusters

51 Heathrow Economic Area
52 London Cancer Hub
53 Battersea (Ransome's Dock)
54 Biggin Hil
55 Chiswick Park
56 Crystal Palace
57 Dagenham East
58 Olympia
59 Royal National Orthopaedic Hospital
60 SC1 King's College Hospital, Denmark Hill
61 St George's Hospital
62 Tottenham
63 Whitechapel

London View Management Framework

- Landmark Viewing Corridor
- Wider Setting Consultation Area
- Background Wider Setting Consultation Area

World Heritage Sites

- World Heritage Site Boundary
- World Heritage Site Buffer Zone

1 Royal Botanic Gardens Kew
2 Maritime Greenwich
3 Palace of Westminster and Westminster Abbey
4 Tower of London

Strategically Important Landmarks

1 Palace of Westminster and Westminster Abbey
2 St Paul's Cathedral
3 Tower of London

Development-management-led Industrial Release Locations

1 Blackhorse Lane
2 South Tottenham
3 The Vale
4 N/A
5 Nursery Lane
6 Oakfield Road
7 Gloucester Road West
8 Dundonald Road Industrial Area

PV1 Brownfield-first Opportunity Areas (BFOAs)

Policy aim: To designate and drive the delivery of Opportunity Areas with strategic growth potential that require significant pro-active coordination and support to overcome barriers.

Applies to: All development within the designated areas.

Locations: Designated OAs.

Plan-making

A Local Plans should help realise the capacity for strategic scale good growth in BFOAs, taking account of the need to optimise development in line with MBUL2 Optimising the use of land and site capacity and the indicative capacities for homes and jobs (in Annex E). This means they should, with reference to the strategic growth visions in Annex E identify the conditions required to allow development to come forward and address these in site allocations, spatial policies, and prioritised interventions that may be supported and secured through planning obligations and other planning tools as appropriate.

Plan-making and development management

B Plans and proposals relating to or in BFOAs should respond to the following strategic principles:

(1) Housing delivery should be optimised through site assembly and wider place-making investment.

(2) SIL and other designated industrial capacity should be supported and sustained, while considering appropriate opportunities for intensification, (see policy GLE2) except where it forms part of identified areas for release as per policy PV5.

(3) Sustainable mode share targets should be ambitious and reflected in the prioritisation of active travel modes, access to public transport and enhanced connectivity to local amenities.

(4) High-quality design should help create value and local benefit in the way it contributes to resilience, access and inclusion; and recognises the role of heritage, culture and local identity in place-making.

(5) The involvement of community voices, particularly those from underrepresented groups, should be sought.

(6) Integration with surrounding neighbourhoods should be secured, avoiding edges and severance, enhancing physical and social connections and contributing to the regeneration and long-term resilience of adjacent communities.

(7) Locally relevant, engaging and activating meanwhile uses should be encouraged, benefiting existing local communities through creating an inclusive sense of place, complementing existing local amenities and supporting local skills development.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant)

should take account of the following:

6.8 Helping to realise the capacity associated with BFOAs will typically require a plan-led approach that will help provide the necessary coordination. In the absence of this being achieved through Local Plans, OAPFs can provide it depending on the circumstances and development needs of each BFOA.

6.9 The Mayor may work with boroughs to identify new BFOAs to emerging strategic transport projects; this may include candidate brownfield BLGs identified on the 20-year key diagram.

Rationale

This policy reflects a number of key considerations:

6.10 BFOAs are identified as locations with significant 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. They are areas that face long-standing barriers to development where coordinated interventions are required to unlock delivery at scale. Where other designations may better suit circumstances of areas, the plan avoids duplication of multiple designations.

6.11 Annex E identifies the key strategic issues and opportunities that will need to be addressed in BFOAs, reflecting extensive collaborative work with boroughs and other stakeholder feedback. Given the intervention required, there may be particular opportunities for growth to be managed in an exemplar way, which should also help with place-making and creating value uplifts.

PV2 Central Activities Zone (CAZ)

Policy aim: To sustain and enhance the CAZ as the global, thriving, vibrant, innovative and iconic heart of London and the powerhouse of the UK economy, promoting its unique international and national roles, whilst enhancing its world-renowned heritage assets and natural environment.

Applies to: All development in CAZ and NIOD.

Locations: Central Activities Zone and NIOD.

Plan-making and development management

A Local plans, and development proposals associated with existing or proposed non-residential uses and/or new housing (as appropriate), should address and positively contribute to the realisation of the following strategic principles:

(1) Promote and grow the unique international and national roles and agglomeration benefits of the CAZ and its associated strategic functions (see Box PV2: CAZ strategic functions) and specialist clusters (see Figure 6.2).

(2) Support the maintenance and growth of a diverse CAZ economic ecosystem including provision of net additional prime office; research and development and other commercial, business and service use floorspace, cultural and night-time

economy activity, leisure, tourism and higher education uses.

(3) Sustain and enhance the CAZ's world-renowned heritage assets and its distinct built and natural environment including the River Thames; the Royal Parks; WHS; strategic views; historic squares; and other valued waterways and green and open spaces.

(4) Promote and enhance the City of London as an internationally important location for financial, professional, business and technology services and the West End as a vibrant international centre for commerce, culture and experience.

(5) Support the vitality, viability and diversification of the international experiential destinations of Oxford Street, Regent Street and Bond Street and Knightsbridge.

(6) Realise the growth potential of the CAZ transformational gateways associated with national rail termini (including at Euston, Liverpool Street, Paddington, Victoria and Waterloo), for development that supports CAZ strategic functions.

(7) Promote, enhance and diversify the internationally significant roles and agglomerations of economic uses in the NIOD including finance, professional and business services, life sciences, creative industries, tech, the experience economy and international education.

(8) Enhance and address the distinct safety and security requirements of the CAZ, its air quality and resilience to climate change, flooding and heat risk arising from the UHI effect.

(9) In areas defined as 'Core CAZ', prioritise, sustain and enhance the agglomerations of CAZ strategic functions (defined in Box PV2), alongside housing and social infrastructure, ensuring that new residential development does not compromise the CAZ strategic functions.

(10) In areas defined as 'Mixed CAZ', promote, sustain and enhance the CAZ strategic functions and realise the potential for new residential development to create areas that are more mixed commercial and residential in character, complemented by social infrastructure.

(11) Support the redevelopment and refurbishment of office space to improve the quantity, quality and energy-efficiency of the stock; and, where it can be demonstrated that it is not viable to redevelop or refurbish as offices, manage changes of use to other CAZ strategic function uses in line with strategic and local policies for core CAZ areas and to a mix of uses including housing in mixed CAZ areas.

(12) Promote an inclusive CAZ economy and a wider cultural and innovation ecosystem, through the availability of a range of business space (including secondary space and markets) and securing the delivery of (or contributions to) affordable workspace.

(13) Deliver enhancements to public transport and digital connectivity infrastructure, strengthening the hyper-connectivity of the CAZ to support its agglomeration of strategic functions, and improve the quality of its public realm for residents, workers and visitors, ensuring it is resilient, safe, accessible and inclusive.

Plan-making

B Relevant plan-making authorities should:

(1) designate and define the detailed boundary of the CAZ and NIOD having regard to Figure 6.2

(2) define the areas that comprise Core CAZ and Mixed CAZ having regard to the indicative areas identified in Figure 6.2, refining and distinguishing these where appropriate from predominantly residential areas or streets

(3) develop local policies tailored to specific areas within Core CAZ and Mixed CAZ in line with the strategic principles set out at paragraph A and supported by targeted Article 4 Directions to remove Class E to residential permitted development rights where appropriate.

Development management

C Development proposals in Core CAZ and Mixed CAZ areas should not lead to a net loss of floorspace (GIA) in CAZ strategic function uses (See Box PV2: CAZ strategic functions) unless:

(1) there is no reasonable prospect of continued existing use or alternative CAZ strategic function use consistent with the local development plan

(2) it can be demonstrated in exceptional circumstances that the property is obsolete and is unviable to refurbish or redevelop for the existing use or for alternative CAZ strategic functions under any circumstances

(3) the site is allocated for housing or housing-led mixed-use development.

Box PV2: CAZ strategic functions

Functions or uses associated with:

1. state, government and monarchy
2. diplomatic organisations (such as embassies and high commissions)
3. financial, professional and business services and technology
4. creative industries and technologies
5. frontier innovation (including life sciences, digital and climate technologies)
6. higher, further and international education
7. law and health
8. the experience economy (including culture, leisure, hospitality, nightlife, retail and events) and 24-hour uses
9. tourism facilities including visitor attractions, hotels and conference centres
10. specialist creative uses including for example clothing, fashion, jewellery, printing, music and antiques
11. places of worship and places of assembly
12. public transport facilities.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

6.12 The NIOD is geographically separate from the CAZ but it is treated as part of the CAZ in London Plan policy. The CAZ is an appropriate location for growth and is now distinguished between core CAZ and mixed CAZ areas. Core CAZ contains potential for growth in a diverse range of locations including the City of London and the West End, all the economic clusters and transformational gateways identified in Figure 6.2, areas around the majority of other public transport stations and interchanges, and core parts of the NIOD.

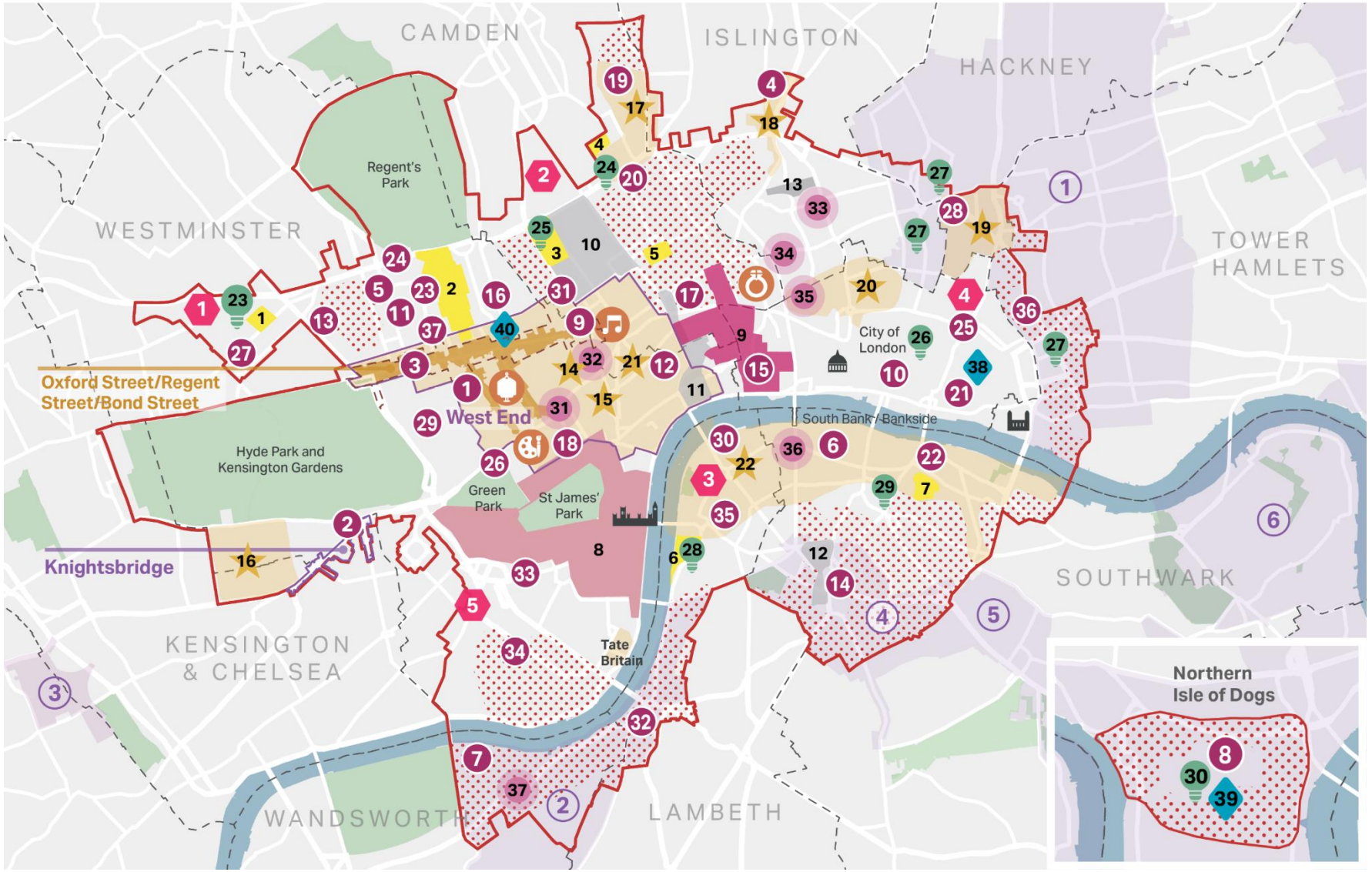
6.13 Mixed CAZ comprises areas where new CAZ strategic functions are promoted alongside new residential development to create areas that are more mixed commercial and residential in character, complemented by social infrastructure. Core CAZ is the default designation in the CAZ and the NIOD unless an area is identified as a mixed CAZ area (having regard to the indicative mixed CAZ areas identified in figure 6.2 or as refined in local plans as appropriate) or a predominantly residential area or residential street.

6.14 The CAZ contains clusters of night-time economic activity including the internationally significant West End (including Soho, Theatreland, Covent Garden, Piccadilly and Charing Cross Road), the South Bank, Waterloo and Bankside, South Kensington, the Barbican and Shoreditch (See Figure 6.2).

6.15 Plan-making authorities should take a positive approach to supporting growth in the night-time economy in these clusters and more generally across core CAZ (in particular) and mixed CAZ areas complemented by the national agent of change principle and promote an integrated approach to planning and licensing, transport, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services. (See also Policy GLE4)

6.16 Al fresco hospitality is encouraged in the CAZ and town centres where appropriate, in line with Policy MBUL9 (Healthy Streets and Public Realm).

Figure 6.2: Strategic CAZ diagram



KEY

- Central Activities Zone & Northern Isle of Dogs
- Royal Parks / Metropolitan Open Land
- River Thames
- Borough boundary
- Opportunity Areas
- International Centres
- Mixed CAZ (indicative areas)

- St Paul's Cathedral
- World Heritage Site: Tower of London
- World Heritage Site: Palace of Westminster and Westminster Abbey including Saint Margaret's Church

Transformational Gateways

1. Paddington
2. Euston
3. Waterloo
4. Liverpool Street
5. Victoria

Health, State, Legal and International Education

- Health
- State
- Legal
- International Education

1. St Mary's Hospital cluster
2. Harley Street
3. University College Hospital
4. Francis Crick Institute
5. Great Ormond Street Hospital
6. St Thomas' Hospital
7. King's College London Guy's Campus
8. Royal Palaces, Palace of Westminster and Whitehall
9. Temple, Royal Courts of Justice, Inns of Court
10. University College London / University of London
11. LSE / King's College London
12. London South Bank University
13. City St George's/ University of London

Internationally Significant Culture and Night-time Economy Clusters

- Internationally significant culture
- Oxford Street/ Regent Street/ Bond Street
- Internationally significant night-time economy

14. Soho
15. Theatreland / Leicester Square / Piccadilly Circus
16. Royal Albert Hall/ South Kensington Museums
17. King's Cross
18. Angel/Sadler's Wells
19. Shoreditch
20. Barbican/ Smithfield
21. Covent Garden
22. South Bank/ Waterloo/ Bankside and London Bridge

Innovation And Life Sciences Clusters

23. Paddington Life Sciences
24. Knowledge Quarter
25. University College Hospital
26. City of London (Technology)
27. Tech City
28. SC1: St Thomas' Hospital
29. SC1: King's College Guy's Hospital / South London / Maudsley Hospital
30. Canary Wharf

Creative Industries and Technologies Clusters

31. West End
32. Soho
33. Clerkenwell
34. Farringdon
35. Smithfield
36. South Bank/Bankside
37. Battersea

Financial, Professional And Business Service Clusters

38. City of London/ City Cluster
39. Northern Isle of Dogs / Canary Wharf
40. West End

Other Specialist Clusters

- Hatton Garden (Jewellery)
- Denmark Street (Music)
- Savile Row (Tailoring)
- Mayfair and St James's (Art and Antique)

Class E / Experience Economy Clusters

1. West End International Centre
2. Knightsbridge International Centre
3. Oxford Street/Regent Street/Bond Street
4. Angel (also part town centre)
5. Baker Street (South)
6. Bankside and the Borough
7. Battersea Power Station
8. Canary Wharf Metropolitan Town Centre
9. Charing Cross Road
10. Cheapside
11. Chiltern Street
12. Covent Garden/Strand
13. Edgware Road (South)
14. Elephant and Castle/Walworth Road (also part town centre)
15. Fleet Street
16. Great Portland Street
17. Holborn (High Holborn/Holborn/Kingsway)
18. Jermyn Street
19. King's Cross Boulevard and Coal Drops Yard
20. King's Cross/Euston Road
21. Leadenhall Market
22. London Bridge
23. Marylebone High Street
24. Marylebone Road
25. Moorgate/Liverpool Street
26. Piccadilly
27. Praed Street/Paddington
28. Shoreditch
29. South Audley / Mount Street
30. South Bank
31. Tottenham Court Road/Charing Cross Road /New Oxford Street
32. Vauxhall
33. Victoria Street
34. Warwick Way/ Tachbrook Street
35. Waterloo
36. Wentworth Street
37. Wigmore Street

Opportunity Areas (OAs)

1. City Fringe /Tech City
2. Vauxhall, Nine Elms and Battersea (VNEB)
3. Earl's Court/West Kensington
4. Elephant and Castle
5. Old Kent Road
6. Canada Water

Rationale

This policy reflects a number of key considerations:

6.17 The CAZ is the vibrant heart and globally-iconic core of London. The density, scale and mix of business functions and activities in the CAZ and the NIOD are unique. The agglomerations of activity are nationally and internationally significant and are underpinned by the unparalleled connectivity provided by public transport, walking and cycling networks. This results in exceptional levels of productivity and economic output, providing London-wide and national benefits.

6.18 In core CAZ areas, CAZ strategic functions are prioritised relative to new residential development. This is to ensure that the agglomerations of CAZ strategic functions and their contributions to the London and UK economy are sustained and enhanced. Mixed CAZ areas are typically more mixed-use in character and CAZ policy recognises their potential to accommodate higher amounts of housing alongside CAZ strategic functions compared to Core CAZ areas.

PV3 Town centres and high streets

Policy aim: To promote the vitality and viability of town centres and high streets, with a diverse range of commercial, civic and social infrastructure uses and housing.

Applies to: All local plans and development in the locations specified

Locations: Town centres, high streets and markets

Plan-making and development management

A Local plans and development proposals should address and positively contribute to the realisation of the following strategic principles:

(1) Promote and enhance town centres and high streets as vibrant, resilient, accessible and inclusive places; and strengthen their role in providing sustainable access to a range of services and economic opportunities and as a focus for Londoners' sense of place and local identity in the capital.

(2) Promote a positive approach to boost economic activity in a diverse mix of daytime and night-time town centre uses.

(3) Promote all town centres as locations suitable for mixed-use and housing-led intensification.

(4) Support the redevelopment and change of use of surplus commercial space to other uses including housing and social infrastructure, whilst retaining active ground floor frontages for town centre uses.

(5) Support flexibility for 'meanwhile' use of vacant sites and premises including affordable workspace and cultural facilities.

(6) Improve the public realm in line with MBUL9 Healthy Streets and Public Realm.

(7) Promote and improve greening and resilience to environmental and climate risks such as flooding and heat.

(8) Support the redevelopment of existing low-density edge-of-centre and out-of-centre

retail and leisure parks (outside of SIL and LSIS) for:

i. housing intensification, with a mix of uses, unit sizes and formats, reducing car dependency and supported by improvements to the public realm and access by public transport, walking and cycling, and/or

ii. providing new capacity for industrial and distribution uses, including micro logistics.

(9) Proposals for the redevelopment of existing low-density edge-of-centre and out-of-centre retail and leisure parks (outside of SIL and LSIS) should not result in a net increase in retail and/or leisure use floorspace (GIA) unless in accordance with the local plan or justified through national sequential and impact assessments.

Plan-making

B Plan-making authorities should designate and develop ambitious local policies for each international, metropolitan, major and district town centre (see Annex B Town centre network, Table B1) to accommodate sustainable economic growth and housing in line with the strategic principles in Part A, covering the following as relevant to the specific town centre:

(1) Locations for a flexible range of town centre uses with a broad mix of premises sizes and formats, including active frontages where such uses are viable and encourage footfall during the day and at night.

(2) Locations suitable for late-night and/or 24-hour premises where appropriate, with complementary measures to support their safe and effective functioning.

(3) Locations suitable for housing intensification, including the scope to:

i. accommodate higher densities

ii. extend upwards or redevelop upper floors at higher densities above town centre uses

iii. repurpose car parks, drive throughs and low-density supermarket sites for mixed-use housing development

iv. consolidate (reduce) town centre and high street frontages where these have been identified as surplus to demand for town centre uses.

(4) Locations where targeted Article 4 Directions are necessary to remove Class E to residential permitted development rights as part of a coordinated approach to increase housing delivery whilst safeguarding active frontages for town centre uses.

(5) Restrictions on concentrations of specific and cumulative sui generis uses (such as betting shops, adult gaming centres, pawnbrokers, pay day loan shops and hot food takeaways) that can have a negative impact on town centre diversity, community safety and/or the health and well-being of Londoners.

C Plan-making authorities should designate future potential town centres where appropriate on their Policies Map (including, but not limited to, those identified in Annex B, Table B2); and include policies and site allocations, supported by masterplans where appropriate, to guide the evolution of these areas in line with the strategic principles in Parts A and B to deliver:

(1) a broad mix of town centres uses, premises sizes and formats

(2) housing intensification

(3) sustainable access by public transport, walking and cycling alongside reduced car dependency

(4) a safe, inclusive and high-quality public realm that is well integrated with surrounding neighbourhoods.

D Plan-making authorities should designate high streets outside of the strategic town centres, including neighbourhood and local centres, which serve more localised catchments and provide safe and convenient access by walking and cycling to employment opportunities and goods and services needed on a day-to-day basis. When designating high streets, neighbourhood and local centres in Policies Maps and preparing local policies for these areas, LPAs should have regard to the potential to:

(1) accommodate town centre uses and new homes

(2) provide access to goods and services by public transport, walking and cycling in areas that are currently poorly served by local shops and services

(3) reduce barriers faced by London's diverse communities in accessing local shops and services, including a safe, inclusive and welcoming environment.

E Plan-making authorities should designate street and covered markets on their Policies Map, having regard to the functional and operational capacity and footprint of the market and develop policies to retain and enhance them, complemented by other measures to improve their management and contribution to London's experience economy, culture, heritage local employment, business start-up opportunities, affordable workspace and the vitality of town centres, high streets and the CAZ.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

6.19 For the purposes of this policy, town centre uses include main town centre uses defined in the NPPF[104] (except drive-through uses) and other complementary uses such as creative and light industrial workspace, research and development uses and social infrastructure. The national sequential test and impact assessments apply to main town centre uses only.

6.20 London's town centres and high streets currently perform a range of different roles and functions in the wider town centre network (see Figure 6.3 and Annex B Town Centre Network Table B1). The network provides a framework for sustainable economic growth and access for London's diverse communities to employment, goods, services, culture and leisure by public transport and active travel modes.

[104] Draft NPPF (2025) 'Main town centre uses' include retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); banks; professional services; offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Figure 6.3: London town centre network (strategic and future potential town centres)

6.21 Changes to the roles and functions of town centres at major and district centre level may occur organically through new development and/or through local plan-led approaches. Changes to town centre classifications at metropolitan and international level should be coordinated through the London Plan or through engagement with the Mayor. Future potential town centres (see Annex B Table 2) include locations that are not currently functioning as a town centre but have the potential to evolve and become a genuine mixed-use town centre in the future supported by Local Plan policies.

6.22 London contains more than 600 high streets of which many are located outside of designated town centres. Some of these high streets are designated as local and neighbourhood centres

in local plans. Plan-making authorities should review the high streets identified by the GLA and consider designating them in policies maps as high streets, local or neighbourhood centres and develop local planning policies for these areas. TfL's SAM may serve as a useful tool for considering areas that are currently poorly served by local shops and services.

6.23 London's strategic town centres play different roles in the night-time economy (see Annex B, and Tables B1 and B2) ranging from international to local significance. Plan-making authorities should take a positive approach to supporting growth in the night-time economy within town centres and high streets, complemented by the Agent of Change principle and promote an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services. (See also Policy GLE4)

6.24 To support the implementation of part E of this policy, the functional capacity of markets includes the number of stalls and/or units, usable floorspace and trading days. Operational capacity includes storage, utilities, waste and servicing. The footprint includes both functional and operational capacity.

6.25 Strategic and local partnership approaches should be supported and encouraged to develop strong, resilient and adaptable town centres and high streets, fulfilling their potential to accommodate economic, cultural and social infrastructure and housing development, and facilitating land assembly where appropriate. These approaches may be in the form of public/private partnerships, town centre management, business associations, neighbourhood forums, trader associations and Business Improvement Districts and should be inclusive and representative of the local community.

Rationale

This policy reflects a number of key considerations:

6.26 Town centres and high streets are a central feature of London's economic and civic life providing opportunities for employment and business start-up and promoting community and cultural exchange. High streets are one of London's most characteristic urban features and many town centres contain important cultural and heritage assets. To continue to thrive they will need to evolve and diversify in response to current and future economic trends, technological advances, consumer behaviours, the imperative to deliver more housing and the development of the 24-hour city.

6.27 Markets play a valuable economic, social and cultural role providing choice and access to a range of food and goods for London's diverse ethnic communities. They contribute to the vitality, character and heritage of town centres, high streets and the CAZ and provide opportunities for employment and for businesses to start-up. Several markets are of strategic importance, such as those at Portobello Road, Borough, Brick Lane, Columbia Road and Camden for example, and offer significant attractions for Londoners and visitors to the capital.

PV4 Strategic economic clusters and corridors

Policy aim: To support the growth and evolution of strategically important clusters of economic activity that are located outside of the CAZ, NIOD, town centres and designated industrial areas.

Applies to: Relevant local plans and development in the designated areas.

Locations: Strategic economic clusters and corridors.

Plan making

A Plan-making authorities should designate, define the boundaries and develop policies for Strategic economic clusters (including those identified in Table 6.1 and the economy key diagram). These should be well-connected by public transport and comprise existing or potential new clusters of economic activity in locations outside of the CAZ, NIOD, town centres or SILs.

B Development Plans should support the growth of wider economic corridors (including those identified in the economy key diagram) in relevant locations for economic growth, including the CAZ, NIOD, town centres, designated industrial areas and Strategic Economic Clusters, and support the provision of necessary infrastructure, land uses, property and associated public space.

Development management

C Development proposals in strategic economic clusters are supported where they:

(1) provide non-residential floorspace appropriate to the needs of businesses and institutions associated with the cluster including specialist economic sectors where relevant

(2) are, or can be made accessible and well-connected by public transport and active travel modes

(3) do not lead to increased car-use, congestion and pollution

(4) provide or support a mix of uses across the cluster, as appropriate, including housing.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

6.28 Plan-making authorities will play a key role in preparing local planning policies to support growth (informed by market evidence of demand) and ensure that strategic economic clusters complement nearby town centres and are well connected by public transport. Improvements to connectivity may be required for some strategic economic clusters that are currently not well served by public transport.

6.29 Planning also has a role to play in supporting the growth of wider economic corridors – by facilitating development in appropriate locations, the provision of infrastructure and cross-boundary coordination. Strategic economic corridors include:

- UK Innovation Corridor: anchored in the Knowledge Quarter, and extending north and east towards Cambridge, Harlow and Stevenage (outside London)
- West Tech Corridor: anchored in White City, and extending north and west through Old Oak and Park Royal, Ealing, and towards Heathrow and Hillingdon
- Thames Estuary Production Corridor: anchored in the Queen Elizabeth Olympic Park and following the River Thames through east London, Essex and Kent.

Rationale

This policy reflects a number of key considerations:

6.30 London contains numerous clusters (and corridors) of economic activity providing space for a range of specialist economic sectors including those identified in the London Growth Plan.

6.31 Most of these are either within the CAZ, NIOD, town centres or SILs, which are covered by other policies in this Plan (See PV2, PV3 or PV5).

6.32 'Strategic economic clusters' is a designation for locations for economic growth that are not in these other areas; and whose growth and evolution are also important to support in line with the London Growth Plan. Some are associated with relatively concentrated geographical areas (such as Earl's Court and London Cancer Hub for example) whilst others, such as the Royal Docks or the Heathrow Economic Area, cover much wider areas.

Table 6.1: Strategic economic clusters:

Cluster	Local Planning Authority	Key sectors / specialisms
Battersea (Ransome's Dock)	Wandsworth	Creative industries
Biggin Hill	Bromley	Aviation, tech/innovation
Chiswick Business Park	Hounslow	Mixed commercial
Crystal Palace	Bromley	Sports/leisure, culture
Dagenham East	Barking & Dagenham	Media, education, industrial
Earl's Court	Kensington & Chelsea, Hammersmith & Fulham	Business, experience economy, culture
Great West Road / Golden Mile	Hounslow	Media, industrial, creative industries
Heathrow Economic Area	Hillingdon, Hounslow	Aviation, logistics, industrial, tech/innovation
London Cancer Hub	Sutton	Health, life-sciences
Olympia	Hammersmith & Fulham	Business, experience economy, culture

Cluster	Local Planning Authority	Key sectors / specialisms
Royal Docks	Newham	Business, experience economy, education, industry
Royal National Orthopaedic Hospital	Harrow	Health, life-sciences
SC1 King's College Hospital, Denmark Hill (SC1 cluster also in CAZ)	Lambeth, Southwark	Health, life-sciences
St George's Hospital	Wandsworth	Health, life-sciences
Tech City (also part CAZ)	Hackney, Islington, Tower Hamlets	Tech/innovation, business
Tottenham	Haringey	Sport/leisure, culture, experience economy, creative industries
White City	Hammersmith & Fulham	Health, life sciences, media, tech/innovation
Whitechapel (part town centre)	Tower Hamlets	Health, life-sciences

PV5 Industrial land supporting housing growth

Policy aim: To support housing delivery in industrial locations that are most suitable.

Applies to: All local plans that include designated industrial areas and development proposals for housing on industrial land.

Locations: Industrial land.

Plan making

A Plan-making authorities should consider release of specific parts of SIL and LSIS in consultation with the Mayor and the plan-making authorities within the same PMA. For this purpose they should identify all SIL and LSIS within SAM level 4 and higher but apply the following exclusion criteria:

(1) They are required to contribute to their strategic and local needs based on this Spatial Strategy.

(2) They are land for infrastructure uses (planned or existing) that rely on industrial land.

(3) They are within clusters of designated industrial land with very good freight access, including water and rail.

(4) They are in the CAZ or a 3km buffer area surrounding its boundary.

(5) They would undermine the effective operation of the remaining uses suited to industrial land (see GLE2 Supply of industrial land Part F) within the designated area overall.

Development management

B Development for housing-led schemes should be supported in advance of release from their industrial designation in the following LSIS locations only.

Table 6.2: Development-management-led industrial release locations

Industrial land designation name	Parcel name	LPA	Property Market Area
Blackhorse Lane	Land West of Blackhorse Lane and North of Hooker's Road	Waltham Forest	Lea Valley
South Tottenham	Whole of South Tottenham	Haringey	Lea Valley
The Vale	Whole of The Vale	Ealing	Park Royal/A40/Heathrow
Palmerston/Oxford Road	Land adjacent to Palmerston Road, Oxford Road and Byron Road	Harrow	Park Royal/A40/Heathrow
Nursery Lane	Whole of Nursery Lane	Newham	Thames Gateway
Oakfield Road	Whole of Oakfield Road	Bromley	Thames Gateway
Union Road	Land south east of Windmill Road and North West of Union Road	Croydon	Wandle Valley
Dundonald Road Industrial Area	Whole of Dundonald Road Industrial Area	Merton	Wandle Valley

C On non-designated industrial land, housing and mixed-use development should be supported where the land is:

(1) not in existing or planned use for infrastructure that relies on industrial land

(2) not in the CAZ, or a 3km buffer area surrounding its boundary, and

(3) located within SAM 4 or higher.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

6.33 The industrial release criteria in part A reflect GLA modelling, with more detail to support

plan-making to be found in the Industrial Evidence Paper.[105] It is recommended that plan-making authorities engage with the Mayor and the plan-making authorities within their PMA when establishing the boundaries of their release areas, taking local detail into account. Plan-led release should be supported by site allocations to make best use of land. Resulting release parcels need to be of an appropriate and deliverable size and shape. Exclusion criterion A(1) only applies, if insufficient capacity has been identified to meet this need, (including in the Green Belt) based on Policy MBUL1 Spatial Strategy, and GLE2 Supply of industrial land.

6.34 Plan-making authorities have the opportunity to proactively define the exact boundaries of the specific release locations listed in Part B based on local circumstances and with relevant landowners to create release parcels of appropriate and deliverable size and shape.

6.35 Where land in industrial uses is not designated or allocated to help meet the plan-making authority's strategic and local needs (see GLE2 Supply of industrial land Part D), brownfield residential (and mixed use) intensification in line with MBUL1 Spatial Strategy will be promoted.

6.36 The Agent of Change principle will apply where housing is introduced, but industrial uses remain. This should help to ensure that 24-hour operations and required operational vehicle access are not undermined. (See also Policy GLE4).

Rationale

This policy reflects a number of key considerations:

6.37 In the light of London's housing need, industrial land has to make an appropriate contribution to meet that need in a coordinated, sustainable and viable manner and on the most accessible brownfield land. This must be done in a way that minimises and mitigates risks to continued industrial requirements and operations.

6.38 The specific release locations listed in Part B are two substantial release parcels in each PMA, at least partly within SAM 5 and also meeting the criteria set out in Part A.

6.39 The focus of release through development management is as far as possible on non-designated industrial land, but as this tends to be smaller in size and/or fragmented, the most accessible designated industrial sites are to be released through development proposals to speed up the delivery of housing and to address the time lag of plan-led release.

PV6 Metropolitan Open Land (MOL)

Policy aim: To establish the purposes of MOL, provide a framework for its protection and a positive strategy for its enhancement together with a mechanism for boundary alterations where specific tests are met.

Applies to: All local plans and all developments affecting MOL.

Locations: All areas of existing or proposed MOL, as well as land adjacent to MOL.

Plan-making

[105] London Plan Evidence | London City Hall

A MOL is land that should remain permanently open and distinct in character and function from the wider built-up area (as set out in part C(1)), and should be protected as such from inappropriate development unless very special circumstances exist

B Any alterations to the boundary of MOL require exceptional circumstances to be robustly demonstrated and should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.

C When defining or amending MOL boundaries as part of plan or Order-making processes, boroughs should, in consultation with the Mayor and adjoining boroughs do the following:

(1) only designate additional MOL where the land is clearly distinguishable from the built-up area by virtue of its openness **and** where it comprises one or more of the following functions of metropolitan-wide significance:

i. publicly accessible open-air facilities for leisure, recreation, sport, the arts and/or culture

ii. extensive green spaces, with natural or historic features or landscapes that contribute to the city's character, setting, biodiversity and/or access to nature

iii. an important part of a strategic corridor, node or link in the city's network of green spaces.

(2) Only release MOL where exceptional circumstances are fully evidenced and justified. Exceptional circumstances may include situations where one of the following applies:

i. The area does not meet the criteria for designating new MOL and is not in a walkable AoD for AGS.

ii. The area is not publicly accessible due to physical, charging or member-only access restrictions; or is within a walkable AoD but there is no reasonable prospect of public access being granted without enabling development. Where enabling development is accepted to be necessary, this should be proportionate in scale to the costs associated with enhancing the quality and accessibility of retained areas of MOL.

iii. There is an overall net gain in the quantity and quality of MOL that meets the needs of a similar catchment.

D As part of the development of policies to address local open space, recreation, sporting and green infrastructure needs, plan-making authorities should identify opportunities to enhance the accessibility, value and function of MOL within their area, including working with adjoining authorities to identify opportunities for linking up isolated pockets of MOL to enhance their combined strategic significance.

E As part of their local plan reviews, boroughs should consider whether areas of Green Belt land which are, or will become, wholly or largely contained within the urban area meet the criteria set out under C(1) and could be suitable for designation as MOL.

Development management

F When considering any planning application affecting MOL, substantial weight should be given to any harm to the function of MOL, including to its openness, as guided by the criteria in C(1). 'Very special circumstances' exist when any harm from development including

to its functionality is clearly outweighed by strategic benefits, including to its functionality.

G Development in MOL will be considered appropriate where one of the following applies:

(1) It is minor development, or development involving previously developed land only (above ground structures), and is beneficial to the strategic function of the MOL set out in part C(1) i and ii.

(2) It is the replacement, extension or alteration of a building used in connection with an appropriate use, provided it does not result in disproportionate additions over and above the size of the original building.

(3) It is the provision of new facilities connected with an appropriate use that enhances the MOL's functionality, including for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the remaining MOL, does not result in a net reduction in public access, or otherwise conflict with the MOL's other established functions set out under C(1).

(4) It is to provide transport, utilities or flood risk infrastructure that can demonstrate a requirement for its specific MOL location.

H Where development includes the delivery of new/newly-accessible green space which would meet the MOL criteria C(1) i or ii, its long-term usage and public access arrangements should be secured.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

6.40 Although the size and function of MOL may vary, especially between inner and outer London, a consistent approach to designation remains important. The designation of too small or more locally significant areas, for example, risks devaluing the strength of the designation as a whole. For green space and open-air facility sites, which are more local in nature, alternative designations should be considered.

6.41 The criteria for designating new MOL in C(1) have been refined to emphasise and clarify the particular functions of MOL in line with Good Growth objectives. However, boroughs are not required to assess the performance of existing MOL. They are encouraged to consider whether isolated pockets of Green Belt or other land with MOL characteristics secured through the planning process, meet the C(1) criteria and may be appropriate for new MOL designation. This may be the case particularly where fragmentation within the urban area has or will occur. The distribution of current designated MOL can be seen in the **Error! Reference source not found.**.

6.42 Any proposed changes to existing MOL boundaries must be accompanied by thorough evidence which demonstrates that there are exceptional circumstances. Enabling development proposals should be plan-led, and opportunities to improve public access and quality without release should be prioritised. Where the criteria in C(2)(ii) are met and releasing part of a site is the only realistic way to enhance access and the strategic function of the remaining land and/or realise a strategic opportunity, those expected improvements should be set out clearly in any site allocations.

6.43 Not all development within MOL is inappropriate. Where it meets the definition of appropriate set out in part G, very special circumstances are not required. Given MOL has distinct function and purposes, as set out in parts A and C(1) of this policy, national Green Belt policies requiring the consideration of releases to meet development shortfalls or in relation to grey belt do not apply to MOL. However, established precedents when applying tests for exceptional and very special circumstances to MOL will continue to apply in the same manner, as historic decisions have always adapted such tests to MOL's strategic role rather those of the Green Belt functions as is appropriate.

6.44 For the purposes of C(2), any releases of MOL hosting recreational facilities should still also be subject to an assessment against relevant policies within the NPPF (e.g. policy HC7). Levels of public access to MOL vary depending on management arrangements but include all sites with free or de facto access (sites readily accessible and clearly used by the public). Determining whether the extent of charging or member only restrictions amounts to a lack of public access will vary case to case, but may include sites that are wholly inaccessible to the general public other than through paid access or membership, unless such fees are nominal.

Rationale

6.45 MOL is a long-established London-specific designation that protects the city's most strategically significant green infrastructure for the benefit of Londoners and the environment. It safeguards open landscapes and improves Londoners' quality of life by protecting areas which offer sporting and leisure use, heritage value, biodiversity, food growing, and health benefits through encouraging walking, running and other physical activity. MOL also plays a key role in linking London's wider green infrastructure network and strengthening biodiversity across the city. Strong protection and positive management strategies for MOL are essential, even more so as growth and climate change places increasing demand for, and pressure on these spaces.

6.46 While MOL shares some characteristics with Green Belt, the two serve different purposes. Both are defined by their openness and aim to maintain clear breaks in the built environment. However, considering changes to Green Belt policies nationally as well as within the London Plan, these policies are now distinct. MOL purposes and functions are set out in parts A and C(1) of this policy, whereas national Green Belt purposes are set out within the NPPF. In addition to its openness, MOL purposes relate to its role as social and environmental infrastructure and do not relate to the national Green Belt purposes, for instance to restrict urban sprawl.

PV7 Sustainable development and enhancement of the Green Belt

Policy aim: To ensure that any Green Belt release within Greater London is focused in the most sustainable locations and optimised to minimise the amount of land required to address unmet need, provide sustainable patterns of development which enable necessary infrastructure and prevent low density, land-hungry and unsustainable forms of development.

Applies to: Boroughs with Green Belt and all developments and decisions affecting Green Belt land.

Locations: All areas of existing or proposed Green Belt, as well as land adjacent to the Green Belt.

Plan-making

A Modifications to Green Belt boundaries through the preparation or review of Local Plans should be undertaken in consultation with the Mayor, TfL and adjoining local planning authorities and should be in general conformity with the London Plan's strategic growth strategy.

B Where a BLG identified within the Green Belt, plan-making authorities should:

(1) consider there to be strategic exceptional circumstances that would justify strategic scale releases of Green Belt land to deliver major residential and/or industrial-led schemes

(2) review Green Belt boundaries in a manner that facilitates delivery of the expected capacity for those locations in line with the London Plan strategic objectives set out in policy MBUL1 Spatial strategy, including through subsequent site allocations to cover these areas

(3) establish key master-planning objectives and parameters for the identified broad location for growth, integrating the relevant aspects of part D of this policy together with necessary infrastructure priorities and enhancement opportunities identified through part C, reflecting these in site allocations.

C Local plans should use the evidence-based approaches set out in this plan to identify Green Belt enhancement opportunities and associated green infrastructure priorities which developments can help to deliver.

Development management

D Development proposals in the Green Belt should demonstrate that:

(1) for major proposals, there is a strategic need for the type of development proposed that cannot be met elsewhere as established in MBUL1 Spatial strategy, HN1 Increasing London's housing stock, GLE2 Supply of industrial land, or a relevant National Policy Statement

(2) it is in a sustainable location for the type of development proposed, with any applicable requirements of Box PV7A: being met

(3) it is a suitable form of development that meets the nationally set golden rules where applicable, and:

i. the relevant London Green Belt sustainable design criteria as set out in boxes Box PV7B: and Box PV7C:, Table 6.3, Figure 6.4 and Figure 6.5; or

ii. for a New Town or other equivalent strategic, housing-led Development Order proposal, it is consistent with a masterplan agreed with the GLA and TfL that achieves the same objectives underpinning the sustainable design criteria set out in boxes PV7B and PV7C via an alternative, design-led solution.

E When considering major development proposals outside of BLG, significant weight should be attributed to a failure to meet any of the requirements set out in Boxes PV7A – C; and such schemes should demonstrate that they would not undermine the ability directly or indirectly to deliver the strategic BLG including any necessary supporting infrastructure. In doing so, particular consideration should be given to the following:

(1) The impact on delivery of prioritised transport improvements linked to the growth strategy of the plan as set out in MBUL1 and MBUL5, including diverting TfL's delivery and investment capacity.

(2) The potential for unacceptable cumulative impacts on other infrastructure, Green Belt function and sensitive heritage, biodiversity and landscape assets when taking account of the scale and pattern of development already planned for within the same plan area by the plan's growth strategy.

(3) The impact of proposed densities, parking provision and sustainable transport access on mode share and congestion given the network impacts mitigation strategy that is reflected in this policy's design and location criteria. All schemes should support a high mode share of sustainable travel and avoid local congestion issues. For residential schemes, the expectation is that day to day journeys should not be reliant on private vehicles, and net densities of at least 90dph should be achieved.

Box PV7A:

Greenbelt sustainable locations

Major proposals should only be regarded as being within a sustainable location for the development type proposed where **at least one** of the following sustainable location tests are met, as relevant:

1. The site is identified as such within an adopted Local Plan, site allocation and/or masterplan that is consistent with this Plan.
2. The site is associated with a government-designated New Town, as described by National Policy Statement.
3. Where 1 and 2 are not met:
   a) For residential-led proposals, the vast majority of new homes would be situated within a 1200m walking distance (or 15 minutes) of one of the rail stations shown on Figure 6.4, or within 400m of a bus route that meets the criteria in Box PV7C.
   b) For industrial proposals, the site is situated within a relevant broad location for growth that is within 2500m of a junction with a suitable section of the strategic highways network shown to have adequate capacity and flow rates to accommodate additional HGV or LGV movements, as shown in Figure 6.5
   c) For data centre proposals, the site would either utilise grey belt land or land towards the edge of a residential-led BLG that would provide the opportunity for low-carbon heat to an existing or future heat network, and the development would accord with the requirements of GLE3 Data centres.
   d) For other employment uses that are compatible with residential, the site would complement plans for residential-led proposals that meet criteria (3a) within the same plan area.

Box PV7B:

Greenbelt sustainable design criteria

1. **Land use optimisation**. Major proposals in the Green Belt should be underpinned by land-use, transport, phasing and design strategies that optimise land by prioritising the best-connected areas, and contribute towards the creation of cohesive, mixed-use, vision-based places.
2. **Development of a comprehensive strategic cluster.** Any developments within one of the identified BLGs should be based on a vision-based masterplan for that location, demonstrating how the individual plot layouts and design positively contribute towards the development of a comprehensive strategic cluster, including proportionate contributions towards identified strategic infrastructure requirements and nearby Green Belt enhancement in line with locally set objectives.
3. **Landscape-led sustainable design.** Any major residential schemes within an identified BLG should also align with the London Green Belt additional sustainable design criteria set out in Table 6.3, unless these are superseded by adopted local policy consistent with this plan, and should demonstrate a landscape-led approach which delivers high quality AGS within the BLG and integrates the development with the surrounding countryside and its key features.

Box PV7C:

Green Belt bus-corridor quality criteria

For major residential developments, a bus corridor will only be considered to meet the service quality necessary to justify a sustainable release of Green Belt and support densities outlined in Table 6.3 where this is agreed by TfL and meets the following criteria:

a) Direct access, in less than 12 minutes, to a rail station which has a service every 7.5 minutes or better through the inter-peak, as well as peak periods of the day.
b) A frequent bus service that meets capacity as required during hours that the associated rail service is operating.
c) Fully dedicated right of way, for example busway or bus/cycle-only streets, bus lanes or bus gates, within greenfield portions of the site, at least 80 per cent dedicated right of way overall and priority at junctions where feasible.
d) Average service speeds in excess of 20km/h.
e) Bus stops designed to handle up to two buses at a time with shelters and real-time passenger information provided.

Table 6.3: London's Green Belt specific sustainable design criteria

Walking distance to suitable rail station	Average net density[73] across BLG band (dwellings per hectare)	Typical building heights (storeys)	Maximum car parking spaces[106] per dwelling	Average quantity of new or newly-accessible green space provision (where there are no locally-set standard above this rate)	Typical distance to local bus stop
<400m	160	5-6	0	3 ha per 1000 new inhabitants	<400m from new homes
400 – 800m	130	4-5	up to 0.3-0.5	3 ha per 1000 new inhabitants	<400m from new homes
800-1200m	90	3-4	up to 0.7-1	3 ha per 1000 new inhabitants	<400m from new homes
>1200m if <400m from a stop on a bus corridor that meets the requirements of Box PV7C	90	3-4	up to 0.7-1	3 ha per 1000 new inhabitants	<400m from new homes

[106] Car parking provision for commercial development in the Green Belt should have regard to the parking standards for Opportunity Areas in GHR11

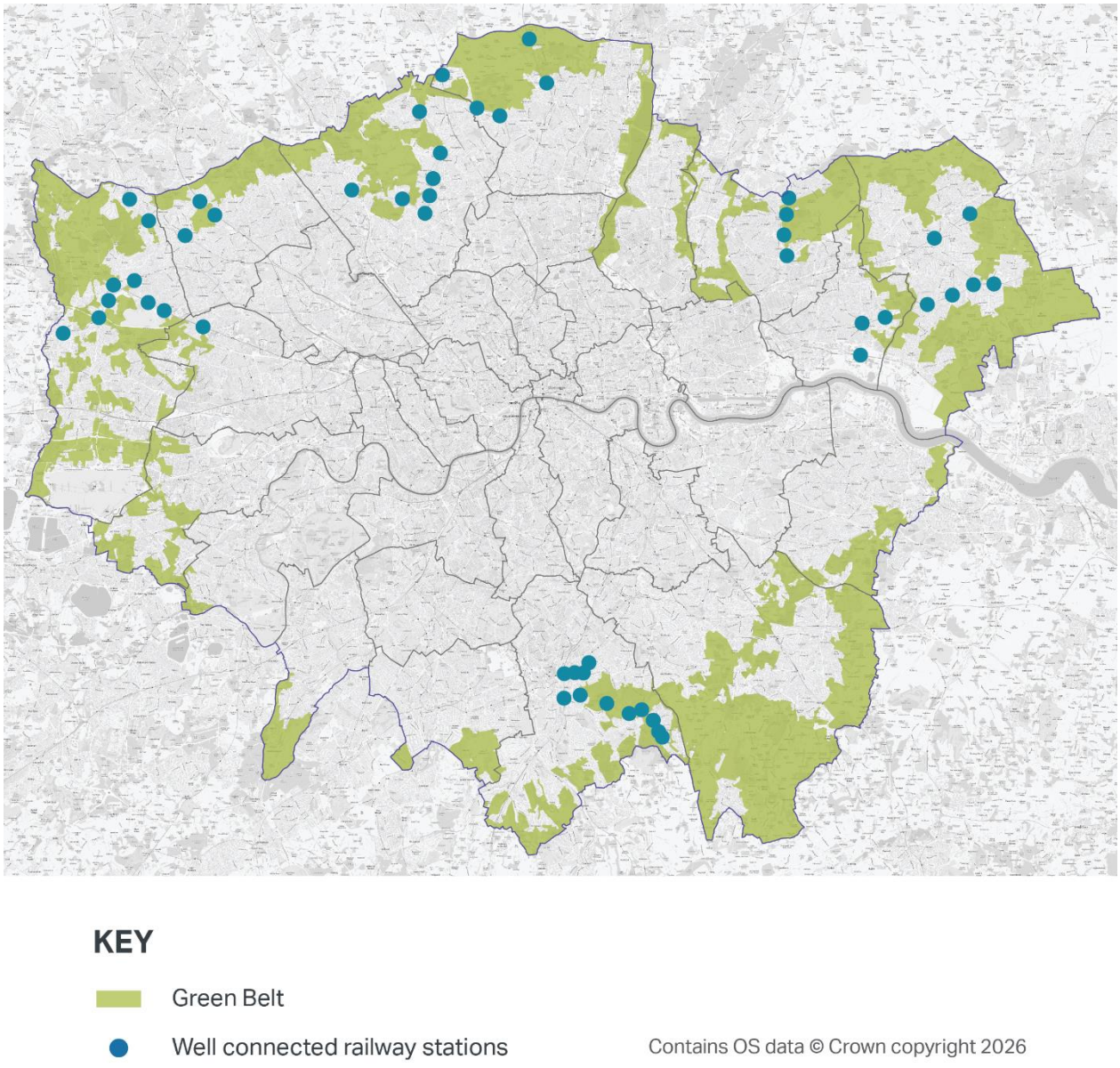


Figure 6.4: Rail stations identified as suitable to accommodate major residential growth (see annex C for locational information)[107]

[107] For a list of the stations included on this figure, see Annex C.

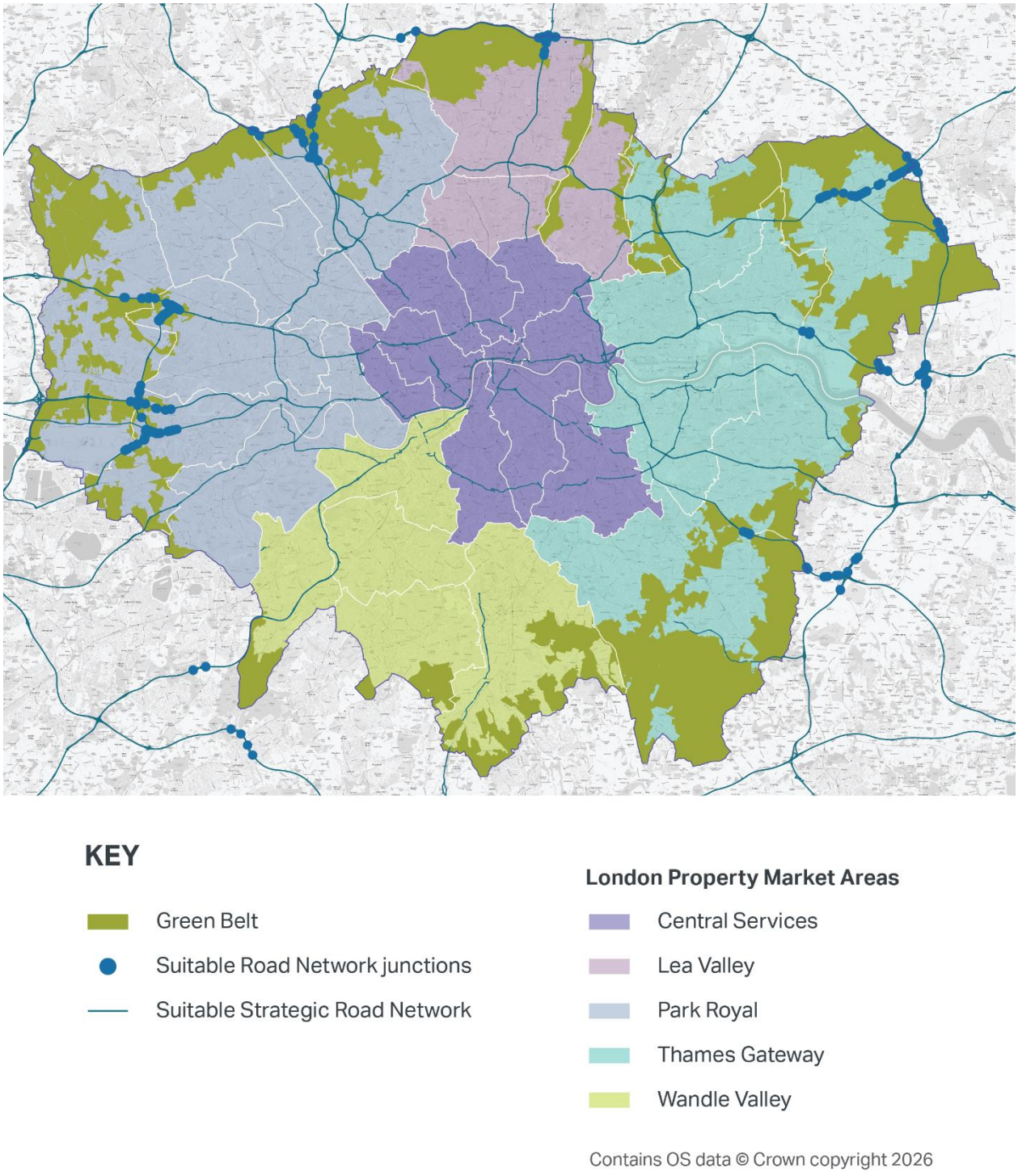


Figure 6.5: Junctions with a suitable section of the strategic road network shown to have adequate capacity and flow rates to accommodate major growth for industrial (see annex C for locational information)[108]

[108] For a list of the junctions included in this figure, see Annex C

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

6.47 The Mayor and TfL will support plan-making authorities responding to Broad Locations of Growth (BLGs) in their areas through Green Belt reviews and wider plan-making, drawing on the strategic evidence underpinning the London Plan to ensure alignment with the spatial growth strategy. As part of these reviews, locations that meet the sustainability criteria set out in Part D and Boxes PV7A–C will be prioritised over grey belt land that does not comply in order to enable the delivery and effectiveness of the Plan's spatial strategy, including planned strategic mitigations.

6.48 The only exception is in relation to data centres, where grey belt land outside of the BLGs may be preferred if the requirements of GLE3 are met as well as sites towards the edge of residential-led BLGs where they would provide an opportunity for low carbon heat (as noted in Box PV7A (3)(c)). This reflects the different operational impacts of this use, for instance lower trip generation compared to industrial uses such as storage and distribution. Other land should only be identified for release (or be brought forward in development proposals) where compatible with the criteria in Part E, and as such is likely to be limited. Land released following a review will remain subject to the full requirements of this policy. Boroughs are encouraged, and will be supported by the Mayor and TfL, to develop full masterplans to cover BLGs in addition to establishing master-planning objectives and principles within site allocations.

6.49 All boroughs containing Green Belt land are required to plan positively for its enhancement, and should draw on the approaches set out in policies GHR6 Trees, biodiversity and geodiversity, GHR7 Green Infrastructure and Urban Greening, and GHR8 Publicly accessible green space to improve its multi-functional value. Boroughs with a Green Belt BLG may leverage associated investment by clearly identifying priority locations and interventions—within or beyond the BLG—that development can help deliver. Strategic level London Plan evidence relating to opportunities for Green Belt enhancement or areas with potential for meeting MOL criteria may provide a useful starting place for boroughs[109].

6.50 Part D, boxes PV7A – PV7C and Table 6.3 of this policy provide an interim strategic framework for assessing proposals that reflect what will be expected to be incorporated in local plans via part A-C of the policy. The 1200m walking distance should be measured through the network where existing or planned rather than 'as the crow flies' and confirmed in discussion with TfL. Bus services are integral to sustainable urban extensions and must be optimised for frequency, speed and interchange quality, alongside complementary local services that meet day-to-day needs.

6.51 For major industrial development, a benchmark distance of 2,500 metres, measured 'as the crow flies', should be used to identify locations with viable, short connections that minimise impacts on sensitive receptors. Where land may meet the sustainability criteria for both residential and industrial, under Box PV7A (3), residential should always be prioritised. Data centres should be assessed primarily against Policy GLE3 and other employment uses may be supported where they contribute positively to a coherent mixed-use vision for a BLG.

6.52 Development within BLGs is expected to contribute to cohesive urban extensions, with priority given to the most accessible sites, even where grey belt land is present elsewhere in

[109] See strategic evidence London Plan Evidence | London City Hall

the borough but falls outside the PV7A thresholds. This includes the expectation that densities and heights increase in areas with the highest connectivity, though the thresholds levels set in Table 6.3 allow for a range of unit typologies and sizes to response to local needs. Net density calculations should follow RICS definitions,[110] excluding non-developable land such as large green spaces, with further guidance provided by emerging national Design and Placemaking Planning Practice Guidance.[111]

6.53 Table 6.3's reference to AGS provision aligns with national standards set out in Natural England's Green Infrastructure Framework, but local standards should be used where these are higher.[112] This relates to the provision of green space only and does not negate the need to separately consider provision for play, sport and recreation in line with relevant national guidance, for instance Sports England's Assessing Needs and Playing Pitch guidance.[113]

6.54 It is recognised that in some cases development will be proposed outside the BLGs; Part E of the policy explains how this should be considered to ensure it does not undermine the overall plan-led approach.

Rationale

This policy reflects a number of key considerations:

6.55 This policy responds to changes to national Green Belt policy , which require the London Plan to establish a strategic justification for any broad locations where boundary changes are necessary to meet the development needs of the area. Alongside the spatial strategy set out in MBLU1, it provides a clear framework for the scale, location and form of Green Belt releases required during the Plan period, while securing robust protection and enhancement of retained areas to support and improve Londoners' access to green spaces. This enhancement should in turn link with the Local Nature Recovery Strategy (LNRS) and other programmes and opportunities.

6.56 The policy sets out a targeted approach to release, defining sustainable locations in the London context to ensure new development is well connected and viably serviced, in turn minimising the amount of land needed. This will come with improved access to good quality green spaces for Londoner and an increase in biodiversity. The BLGs identified have the greatest potential to meet London's good growth needs due to existing infrastructure (or opportunity to enhance it) and the ability to accommodate growth of a critical mass at appropriate densities to sustain public transport, social infrastructure and local economic activity.

6.57 For residential this means proximity to stations that give good access to employment and services via sufficient service frequency and appropriate journey times to minimise car use and ownership (as is required to make the development sustainable). The role of quality bus services in extending the catchment of such stations is also acknowledged. For industrial, this is about connection to the wider strategic road network (and therefore economic clusters within and beyond London) in a way that minimises congestion and air quality impacts.

6.58 Design specifications are oriented towards supporting this optimisation of land and opportunity, ensuring local benefit such as new or enhanced AGS. This approach recognises

[110] See Land measurement for planning and development ready for approvals.pdf May 2021
[111] See Draft Design and Placemaking Planning Practice Guidance (Jan 2026)
[112] See Natural England's Accessible Green space standards online
[113] See Sport England's guidance online

the value of the green spaces as well as the continued value of the Green Belt overall in defining the capital's urban form, limiting sprawl, and protecting extensive areas of predominantly open countryside. The approach is predicated on the basis of building sustainable, liveable neighbourhoods at mid-rise density with access to public transport in order to make the best use of land - this is the only way that overall loss of Green Belt can be minimised.

6.59 The policy is designed to respond to the clear signal from the NPPF and reflect key objectives it sets out, but establishes the particular aspects necessary in the London context to make it workable. The key aspect of divergence is moving away from an ad-hoc approach using grey belt to ensure that Green Belt release can contribute in an optimal way and make the best use of expensive infrastructure and scarce land. This is vital to enable the effective planning of change in London. While the impacts of individual ad-hoc release and development may appear 'reasonable' it is the cumulative impacts that are of significant concern, including on congestion, the environment, and the extra land take required.

6.60 The BLGs would make use of grey belt as far as possible, but this needs to be as an integrated component within the strategic approach. The disparate nature and location of much of that land would otherwise tend to result in proposals for low density development and/or development in unsustainable locations, which would ultimately constrain the overall level of housing delivery. It therefore necessarily supersedes national provisions for ad-hoc release because it enables the otherwise unacceptable adverse impacts of development on infrastructure and the environment to be appropriately minimised, managed and mitigated.

PV8 Strategic and local views

Policy aim: To support development that enables London to grow and change while preserving and enhancing London's most strategic and important views that contribute to the city's identity, including supporting the Outstanding Universal Value (OUV) of London's WHS.

Applies to: All local plans with strategic or local views, all development that interfaces with strategic views.

Locations: All.

Plan-making

A The Mayor has designated a list of Strategic Views (**Error! Reference source not found.**) from publicly accessible and well-used places which look towards Strategically Important Landmarks and other landmarks that make significant aesthetic, historic and/or cultural contribution to how London is understood and appreciated as a global city.

B St Paul's Cathedral, the Palace of Westminster and Westminster Abbey, and the Tower of London are defined as Strategically Important Landmarks. The LVMF identifies and protects aspects of views that contribute to a viewer's ability to recognise and appreciate these landmarks and the authenticity, integrity, and attributes of Outstanding Universal Value of WHS. Where appropriate, these landmarks and WHS are subject to specific geometric constraints, called Protected Vistas and Protected Silhouettes, defined

within the LVMF's Management Plans. LPAs should include all relevant LVMF Viewing Locations, Protected Vistas and Protected Silhouettes in their Local Plans and ensure that their own policies are consistent with the London View Management Framework (LVMF) which provides detailed Visual Management Guidance.

C Plan-making authorities should ensure that the LVMF Viewing Locations are well maintained, including vegetation in the foreground, and afford inclusive access during daylight and evening hours. They should work with relevant landowners to ensure that access is available to enable that all aspects of LVMF to be analysed without cost or hindrance during the planning process.

D Plan-making authorities should clearly identify the most important local views in their Local Plans. Plan-making authorities are advised to use the principles of LVMF criteria, terminology and assessment methodologies for the designation and management of local views. Where a local view crosses Plan-making authorities' boundaries, the relevant Plan-making authorities should work collaboratively to designate and manage the view.

Development management

E Development proposals should be assessed for their impact on a designated view if they are visible within the foreground, middle ground or background of a designated view. Development proposals should make a positive contribution to the characteristics and composition of Strategic Views and their landmark elements, as set out in the LVMF. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks and WHS in these views and protect the silhouette of landmark elements as seen from designated viewing places where these have been identified in the LVMF.

F Where major development is visible in the foreground, middle ground or background of a designated view, applicants should submit a Townscape and Visual Impact Assessment (TVIA) as part of the planning application. This assessment should demonstrate that the proposal is not intrusive, unsightly or prominent to the detriment of the view and that it conserves and, where possible, enhances the viewers' ability to recognise and to appreciate the Strategically-Important Landmarks and WHS (and the OUV) in these views.

G The external illumination of development proposals and structures in the foreground, midground or background of a view should make a positive contribution to the view and not detract from the visibility or prominence of a Strategically Important Landmark or other landmarks identified as making a positive contribution to the view. Assessment of the impact of development in the foreground, middle ground or background of the view or the setting of a Strategically-Important Landmark and/or WHS should take into account the effects of distance and atmospheric or seasonal changes.

H Where there is a Protected Vista, the following applies:

(1) Development that exceeds the threshold height of a Landmark Viewing Corridor should be refused.

(2) Development in the Wider Setting Consultation Area should 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 or damage/detract from the viewer's ability to recognise and to appreciate the Strategically-Important Landmark.

(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.

(4) Where existing buildings currently detract from or block the view, this should not be used as justification for new development to likewise exceed the threshold height of the Landmark Viewing Corridor. Opportunities to reinstate Landmark Viewing Corridors arising as a result of redevelopment and demolition of existing buildings that exceed Landmark Viewing Corridor threshold height should be considered whenever possible.

I Development should not exceed the current skyline profile, at any point along the defined Kinetic Assessment path of a Protected Silhouette indicated in the LVMF.

Implementation

In implementing this policy, applicants, plan-makers, decision-makers and others (as relevant) should take account of the following:

6.61 In managing strategic views, the LVMF provides Visual Management Guidance that draws attention to the general principles for managing development in the foreground, middle ground and background of the view. Each Strategic View is from a specific Viewing Place and within this, the LVMF identifies one or more Viewing Locations from which a viewer is able to experience particular aspects of the view.

6.62 For each Viewing Location, a View Type has been allocated to ensure that key aspects of the view that might be affected by development proposals are correctly analysed and that appropriate visual material is provided to allow positive and negative aspects of the proposals to be identified and assessed during the planning consultation process. Some views are static views where they are experienced from a specific point and others are experienced kinetically as a person moves through a viewing area. A third set of views provide panoramic views across London. Within some views, a Protected Vista has been defined and used to protect the viewer's ability to recognise and appreciate the Strategically-Important Landmark.

6.63 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. The LVMF provides guidance on how Accurate Visual Representations (AVR) should be undertaken, including requirements and considerations about atmospheric or seasonal conditions.

6.64 Plan-making authorities and landowners should manage the viewing locations 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 can risk obscuring a view if it is not regularly maintained.

6.65 Clearly identifying local views in Local Plans and strategies enables the effective management of important local views. Alongside the strategic views of St Paul's Cathedral, the St Paul's Heights limitations are a key tool to maintaining the visibility of St. Paul's Cathedral.

Table 6.4: Designated strategic views

Reference	View

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
7	The Mall to Buckingham Palace
8	Westminster Pier to St Paul's Cathedral
9	King Henry VIII's Mound, Richmond Park to St Paul's Cathedral
10	Tower Bridge
11	London Bridge
12	Southwark Bridge
13	Millennium Bridge and Bankside 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 The Queen's Walk in front of County Hall
22	Albert Embankment between Westminster and Lambeth Bridges
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 the Palace of Westminster and Westminster Abbey
28	Trafalgar Square to the Palace of Westminster

Rationale

This policy reflects a number of key considerations:

6.66 A number of views make a significant contribution to the image and character of London at the strategic level. These Strategic Views are highly valued and impact on people's understanding and appreciation of London overall as a city. They also allow a viewer to see significant historic and cultural landmarks in their landscape or townscape setting and to understand the relationship between them.

6.67 Strategic views cross borough boundaries, and it is therefore essential that a consistent approach is taken to the protection and management of these views. The policy and the linked LVMF provide an important tool for cross boundary coordination in the development process between plan-making authorities, and a model that can be replicated for local views so that there is a consistent approach to defining and managing local views across London.

Glossary

Accessible green space (AGS): Green space that is freely accessible for the public to use. It can either be space that is specifically provided for public access; a space to which the public would usually expect to access (such as a cemetery); or a space to which there is a public right to open access, and therefore deemed likely to be accessible to the public at any reasonable time, with free entry. AGS should be available to all, meaning that every reasonable effort is made to comply with the requirements of the Equality Act 2010. Natural England defines a range of applicable green space types included within the definition of publicly accessible greenspace (see Natural England Green Infrastructure glossary).

Hard-surfaced areas designed primarily for pedestrian use (such as civic spaces and other areas of hard-standing public realm) will generally fall outside of this category and may instead be better defined as public open space. The London Plan formerly used the terminology of 'Public Open Space', this is replaced by AGS in 2026 to better align with terminology used nationally (i.e. by Natural England), and with the Mayor's strategic priority for a greener and more climate resilient London.

Advanced Air Mobility (AAM): A system of new electric or low-emission aircraft, including passenger-carrying electric vertical take-off and landings (eVTOL) and larger uncrewed cargo aircraft, operating at low altitude on planned routes to provide short range urban and regional air transport.

Affordable housing: As defined by the NPPF, and including **Intermediate housing** and **Low-cost rent housing**.

Affordable student accommodation: A bedroom in a PBSA development 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 will be published by the GLA.

Air Quality Management Area (AQMA): An area which a local authority has designated for action, based upon a predication that national Air Quality Objectives will be exceeded.

Air Quality Action Plan (AQAP): A document outlining the actions that a borough will take to improve air quality within their area.

Air Quality Assessment (AQA): An assessment of the impacts a development may have on air quality within the local area, including assessing the impact of the development against Air Quality Objectives.

Air-quality neutral (AQN): An AQN development is one that meets, or improves upon, the air quality neutral benchmarks published in guidance from the GLA. The benchmarks set out the maximum allowable emission of NOx and Particulate Matter based on the size and use class of the proposed development.

Air-quality positive (AQP): A process (which is preferably plan-led and area-based) of identifying and implementing ways to push developments beyond compliance with both the AQN benchmarks and the minimum requirements of an air quality assessment.

Albedo: The ability of surfaces to reflect sunlight. Light-coloured surfaces immediately return a

large part of the solar energy back to the atmosphere (high albedo). Dark surfaces absorb the energy from the sun and convert it to heat (low albedo).

Areas of [Air Quality] Concern: AQMA's, the CAZ and others identified through Local Plans in relation to evidenced air-quality issues.

Article 4 Direction: an order made by an LPA to remove certain permitted development rights in all, or part of, its area

Biodiversity Net Gain (BNG): A mandatory requirement in England that requires applicable developments to have a measurably positive impact ('net gain') on biodiversity, compared to what was there before development; and to act as a way of creating and improving natural habitats. More detail on definitions and standards for BNG can be found in national guidance.[114]

Bus priority: A number of physical measures (e.g. bus lanes, bus gates) to provide road space for buses and/or operational measures, such as signal priority, to provide buses with priority over general traffic to support efficient progress of buses through the street network.

Major new developments with new street networks need to be designed around the bus e.g. bus and cycle only streets from the start and have layouts that prioritise buses with shorter more direct routings than available for general traffic. Such streets should be designed so buses can fit with ease, have good quality accessible bus stops and are in line with TfL Bus priority design guidance and Healthy Streets criteria.

Class E: A broad category of land uses covering commercial, businesses and services where planning permission is not required to change between the uses, unless they are subject to an Article 4 Direction

Connectivity: The extent to which services and amenities can be easily reached by public transport, walking and, where applicable, cycling. The SAM is the primary means of assessing this within London. The PTAL can also be appropriate as a comparator of relative connectivity within a local area.

Culture: The people, places and activities of creative production and consumption

Drone: An uncrewed aircraft that is remotely piloted or operates autonomously, typically used for small-scale operations, including last-mile delivery, surveys, or inspections. Drones generally fly at low altitude; are relatively small in scale, and do not carry passengers. They take off and land vertically and are usually electrically powered.

Energy use intensity (EUI): The amount of total energy needed to run a building over a year (per sqm)

Environmental Opportunity Areas (EOAs): Areas identified within the London Plan environment sub-key diagram and referenced in policies MBUL1, GHR7 and GHR9. The areas are identified based on their potential to deliver or enhance green and/or blue infrastructure of strategic significance for Londoners. Where EOAs are identified, specific expectations apply to integrate into local spatial policies and support their delivery. They comprise four categories:

[114] https://www.gov.uk/government/collections/biodiversity-net-gain

- **Existing regional parks**: AGS larger than 400 hectares (as defined in Policy GHR8), that provide strategic-scale provision for Londoners, and which are likely to have potential for enhancement to increase their reach/capacity.
- **Regional park opportunities:** Opportunities for the creation or designation of new regional parks, associated with active partnerships and/or identified in current Local Plans (or older strategies that still have the potential to be realised).
- **Local Nature Recovery Strategy locations** (extensive potential measure): These represent more extensive areas of Potential Measure locations (or clusters) that may provide greater opportunity for nature recovery interventions at a strategic scale. They do not comprise the full LNRS potential measure locations.
- **Clean and Healthy Waterways Plan Strategic Locations:** identified by the Clean and Healthy Waterways Plan as being places where coordinated action can bring rapid and significant improvements for people and nature.

Electric vertical take-off and landing (eVTOL): A larger electric aircraft designed for vertical take-off and landing, capable of transporting passengers or cargo as part of an Advanced Air Mobility (AAM) system. They operate on planned routes, require dedicated infrastructure (such as vertiports), and are regulated as aircraft within the broader aviation system.

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.

Good Homes Alliance early stage overheating risk tool: A tool intended for use at the early design stages of new residential development in order to identify key factors contributing to overheating risk, and possible mitigation measures.

Green Belt: Land that is formally designated within local plans based on the role it plays in achieving the fundamental aim of national Green Belt policy – to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence, though national policy also sets out five purposes that provide greater detail to this fundamental aim and against which Green Belt performance is assessed.[115] Within the London Plan, reference to Green Belt relates to areas of land designated as such within the Greater London boundary only. Any land that might meet the government's definition of grey belt is included within the definition of Green Belt, though in some instances throughout the plan specific distinctions are applied to such areas.

Green infrastructure: A network of green spaces and features such as street trees, green roofs and blue spaces – that are 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 supporting health, wellbeing and cultural identity.

Green space: Green space is any open area that is predominantly vegetated or unpaved bare ground, set within the townscape. These can include blue spaces (i.e. lakes, rivers and wetlands) and may include ancillary-built environment features. It excludes open space that is predominantly hard-landscaped, such as civic squares, plazas and other paved public realm.

Grey belt: Green Belt land that also meets the nationally set definitions and test for grey belt set

[115] See National Planning Policy Framework (Dec 2024), para.143 (online)

out within the national planning policy framework and associated national planning guidance[116]

Group housing: Schemes designed to accommodate large households that include extended family members. They include additional facilities and amenities. For example, homes may have enough bedrooms to accommodate larger families, with space for residents and visiting families to park vehicles such as caravans.

Healthy Streets Approach: A system of policies and strategies to deliver a healthier, more inclusive city where people choose to walk, cycle and use public transport. The 10 Healthy Streets Indicators are the essential ingredients for a healthy street environment.

Higher education provider: An education institution that provides a designated course at qualification Level 4 or above, approved by the Department for Education for higher education study which allows the student to apply for government-financed student loans. The Office for Students maintains a list of English higher education providers (those registered with Office for Students): Office for Students, The OfS Register

Houses in Multiple Occupation (HMOs): Dwellings that are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet. HMOs for between three and six people are classed as Use Class C4 whereas HMOs for more than six people are sui generis. The definition of an HMO is set out in the Housing Act 2004.

Inclusive built environment: An environment that responds to and accommodates differences in the way people use and interact with the built environment. It does not separate, or isolate. It facilitates independent participation and dignified use, and a sense of safety, offering flexibility and choice for a diverse range of end-users. This includes the requirements of any protected characteristic group potentially impacted by the design of the built environment.

Industrial uses: Include B2, B8, Eg(iii), Eg(ii) and sui generis infrastructure uses that depend on industrial land but exclude data centres

Industrial intensification: Developments for industrial uses that increase the existing or potential local industrial floorspace capacity of a site having regard to the servicing and operational requirements of the proposed industrial uses.

Intermediate housing: Housing for households that cannot afford market housing, but are not eligible for low-cost rent housing, including Key Worker Living Rent, London Living Rent and London Shared Ownership.

Key Worker Living Rent: A type of affordable housing designed to help middle-income Londoners – especially key workers – with rents (including service charges) set by the GLA using key workers' average household incomes.

Key Workers: Typically defined with reference to the jobs they perform and are essential local workers, typically public sector employees who provide frontline services in areas including health, education and community safety. For further information see the Mayor's Housing Policy Practice Note Allocating intermediate homes to London's key workers.

Larger cycles: Include tandem cycles, cargo cycles, recumbent cycles, wheelchair-friendly tricycles, hand cycles and cycles with trailers.

[116] See National Green Belt Planning Practice Guidance (online).

Large-scale Purpose-built Shared Living (LSPBSL) development (Also known as 'co-living'): A type of sui generis non-self-contained market housing, generally comprising 50 units or more, designed for those who cannot or choose not to live in self-contained homes or HMOs. It generally includes additional services and facilities as part of the tenancy such as room cleaning, bed linen, an on-site gym and a concierge service.

Local Plans: references include Supplementary Plans

Locally Significant Industrial Sites (LSIS): Sites of local importance for industrial and related functions. They are identified and designated in Local Plans based on evidence of strategic and local need and complement provision in SILs.

Local Nature Recovery Strategy (LNRS): A system of spatial strategies for nature and environmental improvement required by law under s.104 of the Environment Act 2021. The London LNRS was created with help from all 33 of the London Boroughs (including the City of London), plus other organisations, communities, and Londoners. It is a spatial tool for nature, setting out which aspects of nature need the most attention; what action needs to be taken to improve nature; and where that action should be focused. The LNRS comprises a *Statement of Biodiversity Priorities* (presenting the 'what' (biodiversity priorities) and 'how' (measures) for nature recovery activity in London) and a *Local Habitat Map (*setting out the 'where', by showing where measures could be carried out to deliver biodiversity priorities).

London Green Infrastructure Framework (LGIF): A strategic evidence tool to help plan and prioritise investment in green infrastructure in London. It brings together key data relevant to green infrastructure in one place, to help decision-makers identify where and how to invest in GI to maximise the benefits it delivers for Londoners.

London Affordable Rent: Homes for households on low incomes where rent levels are based on the Social Housing Regulator's Rent Standard Guidance, are capped at benchmark levels issued by the GLA and are significantly less than 80 per cent of market rents. These are funded in more limited circumstances than social rent.

London Living Rent (LLR): Intermediate-rent homes for Londoners on average incomes. Where funded by the GLA, LLR will be a Rent to Buy product, with sub-market rents that will help households on average income levels to save for a deposit.

London Shared Ownership (LSO): Intermediate-sale homes that allow households that cannot afford market sale to purchase a share in a home and pay rent lower rent on the unsold share.

Low-cost rent housing: Housing allocated to households in greatest housing need on borough housing waiting lists. This includes **Social rent homes** and **London Affordable Rent.**

Metropolitan-scale tall buildings: buildings of 100 metres and above in height. This height is measured from the ground level to the roofline of the building, including any rooftop equipment.

Micromobility: Small vehicles used to get people and goods around a city and which can be safely used alongside people cycling in cycleways. These vehicles do not have internal combustion engines and electric assist, if present, does not operate above 15.5 miles per hour (as per the Electrically Assisted Pedal Cycles Regulations 1983).

Metropolitan Open Land (MOL): Open land designated as such within local plans that is protected from inappropriate development due to its strategic importance for the whole of London and enhanced to improve its quality and range of uses. It refers to extensive tracts of land

contained within the urban extent that are open in character, providing attractive breaks in the built-up area, as well as performing a variety of functions that contribute to this significance. These functions are set out in part C (1) of policy PV6. It plays an important role in London's green infrastructure, protects and enhances the open environment and improves Londoners' quality of life and access to physical activity.

Negotiated stopping: An agreement between a landowner (often a local authority) and Gypsy, Traveller and Travelling Showpeople household, that allows households to stop at a site for a specified period, subject to meeting conditions.

Nightlife: The activities, events and spaces that encourage social and cultural participation primarily between 6 pm and 6 am.

Night-time economy: The range of economic activities that take place after typical daytime working hours, including cultural and leisure activities; activities that support night-time cultural and leisure activities; 24-hour health and personal social services; and activities which support wider social and economic activities.

Nomination Agreement: These establish the right of the signatory higher education provider(s) to allocate to their students a proportion of the PBSA in a block they don't otherwise control. Nominees are typically international or first-year students to whom universities offer 'accommodation guarantees' as part of their recruitment offer.

Non-self-contained accommodation: Housing where different households may occupy individual units within the development, whilst sharing communal facilities, such as kitchens and bathrooms. This term is often used interchangeably with HMO and includes but is not limited to: bed-sits, hostels, student accommodation and other types of specialist and supported housing described by this plan.

Notice to Quit: A legal document which building owners serve on telecom infrastructure providers to remove their assets from the building to make way for redevelopment.

Older person's accommodation: Homes designed and managed for persons over 55 years, that may or not include some element of care. Where personal care is offered, this is separately contracted to the accommodation offer and is subject to choice of provider by the resident. The accommodation element is occupied under long-lease or freehold; tenancy agreement; licensing agreement; license to occupy premises; or a leasehold agreement. The Care Quality Commission are only likely to be the regulators of any personal care offer and is not responsible for oversight of the accommodation generally. This accommodation type is not to be conflated with 'care home accommodation' which offers personal care and housing as a combined package, where residents cannot commission personal care from an alternative provider, there are no occupancy agreements (such as tenancy or licensing, freehold or leasehold agreements) and Care Quality Commission involvement will be as a regulator of accommodation for persons who require nursing or personal care.

Operational parking: Parking for vehicles that are required for the function of a building or the activities within it. This can include spaces for fleet vehicles, taxis or loading bays, but does not include parking for personal travel such as commuting.

Public realm: Public realm includes all the publicly-accessible space between and within buildings, whether public or privately owned – from alleyways and streets to squares, open spaces and parks, including the Thames and London's waterways, Thames Path, Green Loop, etc.

Internal or elevated spaces that are publicly accessible are also considered public realm, such as markets, shopping centres, sky gardens, viewing platforms, museums and station concourses.

Referable applications: Large-scale or strategically significant development proposals in Greater London that, due to their form, size or impacts, must be submitted to the Mayor of London for scrutiny alongside the LPA (usually the borough council). Only planning applications of potential strategic importance (PSI) are referred to the Mayor. The definition of PSI is set out under the Mayor of London Order 2008, as amended in 2026. For the purpose of this draft plan where policies apply to 'referable' applications, this means those schemes that are referable to the GLA from the outset, not those that may become referable depending on whether they are recommended for refusal.

Serviced visitor accommodation: Short-term accommodation that is usually available to book on a nightly basis, or with a minimum stay restriction of no more than seven days. It includes hotels, bed & breakfasts, guest houses, apart-hotels and hostels where services such as catering and cleaning are provided to guests.

Social rent homes: see NPPF

Space heating demand (SHD): is the amount of heat energy needed to heat a building over a year (per sqm)

Strategic Industrial Locations (SIL): London's largest concentrations of long-term industrial, logistics and related capacity for uses that support the functioning of London's economy. They are identified in the London Plan, and their boundaries are identified in Local Plans.

Strategic Sites: are defined as larger sites that contribute significantly to BLGs, and/or otherwise involve plan-led industrial release.

Student: For the implementation of this policy, a student is a person following a course in higher education as recognised by the Office for Students.

Supported and specialist accommodation: One of several accommodation types (typically non-self-contained) for those with support needs. It may or may not be in a hostel setting and is likely to include some communal facilities as well as personal living space. This may include but is not limited to transitional supported housing for people in crisis or with temporary support needs, long-term supported housing for people with enduring or lifelong needs, older people's supported housing for people aged 55 and over with support or care needs (such as care homes, but excluding other types of older persons accommodation as defined in this glossary) or specialist homes designed for specific communities or needs, without support. Further detail and definition can be found in the Mayor's Capital Funding Guide.

Sustainable modes: Walking, cycling and public transport.

Transit site: An authorised site for short stays provided on a permanent basis by local authorities with basic amenities such as water supply, shared toilets, washing facilities/utility room and waste disposal.

Upfront embodied carbon: The greenhouse gas emissions associated with material and construction stages: raw material extraction and processsing, manufacture, transport and construction of all building elements.

Urban logistics hub: A small site – typically in an urban location and integrated with other

development – that couriers use for their day-to-day deliveries as a place to receive, sort and then send deliveries to their destination by cargo bikes, walking porters or small electric vans.

Urban Heat Island (UHI) effect: The phenomenon where temperatures are relatively higher in cities, compared to surrounding rural areas; this may be due to, for example, the urban surfaces and anthropogenic heat sources.

Walking and cycling: A diverse range of active modes of travel, include 'wheeling' trips made by wheelchair and also by scooter, rollerblades, pushchairs and similar forms of active mobility. Cycling refers to all forms of cycling including trips made using tricycles, hand-cycles and other adapted cycles, cargo cycles and e-bikes.

Whole-life-cycle carbon (WLC): The carbon emissions resulting from materials, construction and use over a building's entire life, including upfront embodied carbon, the energy and resources used in the building during operation; and its demolition and disposal.

World Health Organization (WHO) interim targets: A set of set of evidence-based recommendations of limit values for specific air pollutants developed to help countries achieve air quality that protects public health

Table of abbreviations

Abbreviation	Full text
ACB	Areas that Could Become of Importance for Biodiversity
ACV	Asset of Community Value
AGS	Accessible Green space
APA	Archaeological Priority Area
APIB	Areas of Particular Importance for Biodiversity
AOD	Above Ordnance Datum
AoD	Area of deficiency (in access to AGS)
AQA	Air Quality Assessment
BFOA	Brownfield First Opportunity Area
BLE	Bakerloo Line Extension
BLG	Broad Location for Growth
BNG	Biodiversity Net Gain
BREEAM	Building Research Establishment Environmental Assessment Method
BtR	Build to Rent

CAZ	Central Activities Zone
CD&E	Construction, demolition and excavation
CE	Circular Economy
CEng	Chartered Engineer
CEZ	Creative Enterprise Zone
CIBSE	Chartered Institution of Building Services Engineers
CIL	Community Infrastructure Levy
CO_2	Carbon dioxide
CSA	Central Services Area
DLR	Docklands Light Railway
EUI	Energy Use Intensity
GHA	Good Homes Alliance
GIA	Gross Internal Area
GLA	Greater London Authority
GLHER	Greater London Historic Environment Record
Ha	Hectare
HMO	House in Multiple Occupation
HS2	High Speed 2
IEng	Incorporated engineer
kWh	Kilowatt hour
LAA	Local Aggregates Assessment
LAEI	London Atmospheric Emissions Inventory
LDO	Local Development Order
LETI	Low Energy Transformation Initiative
LGBTQ+	Lesbian Gay Bisexual Trans Queer +
LGIF	London Green Infrastructure Framework
LLR	London Living Rent

LSIS	Locally Significant Industrial Sites
LSPBSL	Large-scale purpose-built Shared Living
LVMF	London View Management Framework
MMO	Marine Management Organisation
MOL	Metropolitan Open Land
NHS	National Health Service
NIOD	Northern Isle of Dogs
NO_2	Nitrogen dioxide
NOx	Oxides of nitrogen, or nitrogen oxides: a mixture of nitric oxide and nitrogen dioxide
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
PLA	Port of London Authority
PMA	Property Market Areaa
PPG	Planning Practice Guidance
PTAL	Public Transport Access Level
PV	Photovoltaic
SAC	Special Areas of Conservation
SAM	Sustainable Access Measure
SuDS	Sustainable Drainage Systems
SEC	Strategic Economic Cluster
SHD	Space Heating Demand
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment

SIL	Strategic Industrial Locations
SINC	Site of Importance for Nature Conservation
SMEs	Small and medium-sized enterprises (including micro-businesses)
SPA	Special Protection Areas
Sqm	Square metres
TE2100	Thames Estuary 2100 Plan
TfL	Transport for London
TPA	Thames Policy Area
TPP	Tree Protection Plan
UGF	Urban Greening Factor
UHI	Urban Heat Island
UKNZCBS	UK Net Zero Carbon Building Standard
WHS	World Heritage Sites
WSE	Wider South East

Annex A Monitoring

New London Plan Monitoring Approach

The provisional list of Key Performance Indicators (KPIs) is set out in Table X below. These are policy outputs that should be directly influenced by the application of policies in this plan and Mayoral oversight. The suite of KPIs highlights areas of particular importance as part of Good Growth, but is necessarily constrained by data availability and concerns for overall process streamlining. It is provisional as it is prepared in the context of impending National Planning Data Standards and ahead of other monitoring frameworks being finalised (e.g. relating to the Local Nature Recovery Strategy) which may affect these practical considerations.

The London Plan Annual Monitoring Report (AMR) will provide additional analysis and commentary on a wider range of data that reflects the breadth of policies in the Plan as part of the overall process of plan monitoring and ultimately, review. This may include feedback from engagement that takes place in the relevant monitoring year, and other more qualitative data.
The AMR will also link to relevant wider contextual or outcome indicators, some of which are reported on through the annual State of London report (London-wide outcomes) and others of which are more planning focused, for instance, relating to traffic congestion and waste self-sufficiency. These are things the Plan's policies ultimately aim to influence, but which are also affected by many other things, including the wider economic context, other Mayoral interventions, and national government policies.

The KPIs and wider information presented in the AMR also contribute the monitoring required by as part of the Integrated Impact Assessment (IIA) given the considerable overlap between plan Good Growth Objectives and IIA Objectives.

Table A1: Proposed Key Performance Indicators

Good Growth Objective	KPI number and name	Indicator Description and target	Target/expected direction of travel
Making Best Use of Land	1. Brownfield First and minimising loss of Green Belt	a. Proportion of homes consented on brownfield land b. Average net residential density on Green Belt development	a. Over 80% b. 90+ dph
Making Best Use of Land	2. Making best use of transport connectivity	a. Proportion of new homes in well-connected areas (SAM4+ or in Green Belt BLGs) b. Proportion of residential development schemes compliant with parking standards	a. TBC based on SHLAA b. Improving relative to current benchmark
Making Best Use of Land	3. Environmental Assets & Opportunity	a. Net loss/gain of MOL b. Ha of nature recovery/ secured through referable development (direct or through BNG contributions)	a. No net loss, increase in MOL extent expected over time b. Increasing trend

Making Best Use of Land	4. World Heritage Sites	Number of referable consents resulting in overall heritage harm to the Outstanding Universal Value of a London World Heritage Site	Stable but preferably negative trend
Homes and Neighbourhoods that Londoners Need	5. Supply of Housing	No of new homes approved and completed	Pipeline should be increasing and more than target. Completions should be as per plan target.
Homes and Neighbourhoods that Londoners Need	6. Affordable Housing	Percentage of affordable housing approved and completed	Increasing to need levels
Homes and Neighbourhoods that Londoners Need	7. Accessible housing	Number and proportion of wheelchair accessible homes approved and completed	a. 10 per cent affordable homes that meet Building Regulation requirement M4(3)(2)(b) 'wheelchair accessible dwellings'; b. 10 per cent market homes that meet Building Regulation requirement M4(3)(2)(a) 'wheelchair adaptable dwellings'; c. Percentage of homes within the scheme that meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
Homes and Neighbourhoods that Londoners Need	8. Housing quality	a. Proportion of homes meeting private amenity space standards in referable consents b. Proportion of referable residential consents that have undergone an independent design review	a. Increasing trend b. 100 per cent
Growing London's Economy in a way that benefits all	9. Employment floorspace for a growing economy	a. Office space under construction and remaining pipeline b. Storage and distribution net completions and pipeline	a. Pipeline of consented office floorspace is at least three times the average office floorspace construction started over the previous three years.

			b. Monitor relative to Table 4.1 benchmarks by PMA
Growing London's Economy in a way that benefits all	10. Affordable workspace	Affordable workspace secured (floorspace and £ contributions) as part of referable developments	Increasing proportionate to additions of Class E(g), B8 and data centre floorspace in locations where affordable workspace is required
Growing London's Economy in a way that benefits all	11. Cultural venues and pubs	Net loss of cultural venues and pubs as part of approved referable developments	No net loss
Growing London's Economy in a way that benefits all	12. Data centres	a. Energy reuse factor -Proportion of total energy input of referable data centre developments reused externally (in heat network) b. Proportion of referable data centre developments achieving Power Usage Effectiveness (PUE) ratio of at least 1.1	a. increase in the average across the referable schemes per year over time b. increase in the average across the referable schemes per year over time
Greener, Healthier, More Resilient London	13. Energy-efficiency	Proportion of approved referable developments meeting or below EUI targets	Increasing
Greener, Healthier, More Resilient London	14. Surface-water flood risk	Proportion of approved referable applications achieving greenfield runoff rate	TBC relative to current benchmark
Greener, Healthier, More Resilient London	15. Accessible green space	Hectares of new AGS secured through referable development consents	Increasing
Greener, Healthier, More Resilient London	16. Air quality	Proportion of applicable approved developments achieving at least Air Quality Neutral standards	At least 80%

Annex B Town centre network

Table B1: London town centre network - strategic town centres

Ref	Town centre	LPA	Town centre classification*	Night-time economy classification^
1	West End	Westminster / Camden / Oxford Street Development Corporation[117]	International	NT1
2	Knightsbridge	Kensington and Chelsea / Westminster	International	NT2
3	Bromley	Bromley	Metropolitan	NT2
4	Camden Town	Camden	Metropolitan	NT1
5	Canary Wharf	Tower Hamlets	Metropolitan	NT2
6	Clapham Junction	Wandsworth	Metropolitan	NT2
7	Croydon	Croydon	Metropolitan	NT2
8	Ealing	Ealing	Metropolitan	NT2
9	Harrow	Harrow	Metropolitan	NT2
10	Hounslow	Hounslow	Metropolitan	NT2
11	Ilford	Redbridge	Metropolitan	NT2
12	Kingston	Kingston	Metropolitan	NT2
13	Lewisham	Lewisham	Metropolitan	NT2
14	Romford	Havering	Metropolitan	NT2
15	Shepherds Bush	Hammersmith and Fulham	Metropolitan	NT2
16	Stratford	Newham	Metropolitan	NT2
17	Sutton	Sutton	Metropolitan	NT2
18	Uxbridge	Hillingdon	Metropolitan	NT2
19	Wembley	Brent	Metropolitan	NT1
20	Wood Green	Haringey	Metropolitan	NT2
21	Woolwich	Greenwich	Major (future potential Metropolitan)	NT2
22	Barking	Barking and Dagenham	Major	NT3
23	Edgware	Barnet / Harrow	Major	NT4
24	Bexleyheath	Bexley	Major	NT2
25	Kilburn	Brent / Camden	Major	NT3
26	Orpington	Bromley	Major	NT3
27	Swiss Cottage/ Finchley Road	Camden	Major	NT2
28	Acton	Ealing	Major	NT3
29	Southall	Ealing	Major	NT3
30	Edmonton Green	Enfield	Major	NT4
31	Enfield Town	Enfield	Major	NT4
32	Eltham	Greenwich	Major	NT3
33	Greenwich	Greenwich	Major	NT2
34	Dalston	Hackney	Major	NT2

[117] Oxford Street Development Corporation planning powers anticipated to be established during 2026

Ref	Town centre	LPA	Town centre classification*	Night-time economy classification^
35	Hackney Central	Hackney	Major	NT2
36	Fulham	Hammersmith and Fulham	Major	NT2
37	Hammersmith	Hammersmith and Fulham	Major	NT2
38	Green Lanes	Haringey	Major	NT3
39	Chiswick	Hounslow	Major	NT3
40	Angel	Islington	Major	NT1
41	Nags Head	Islington	Major	NT3
42	Finsbury Park	Islington / Hackney / Haringey	Major	NT2
43	Kensington High Street	Kensington and Chelsea	Major	NT2
44	King's Road (east)	Kensington and Chelsea	Major	NT2
45	New Malden	Kingston	Major	NT4
46	Brixton	Lambeth	Major	NT1
47	Streatham	Lambeth	Major	NT3
48	Catford	Lewisham	Major	NT3
49	Colliers Wood	Merton	Major	NT3
50	Wimbledon	Merton	Major	NT2
51	East Ham	Newham	Major	NT3
52	Green Street	Newham	Major	NT3
53	Richmond	Richmond	Major	NT2
54	Twickenham	Richmond	Major	NT3
55	Canada Water	Southwark	Major	NT3
56	Elephant and Castle/ Walworth Road	Southwark	Major	NT2
57	Peckham	Southwark	Major	NT2
58	Leytonstone	Waltham Forest	Major	NT4
59	Walthamstow	Waltham Forest	Major	NT2
60	Putney	Wandsworth	Major	NT2
61	Tooting	Wandsworth	Major	NT2
62	Wandsworth	Wandsworth	Major	NT3
63	Queensway/ Westbourne Grove	Westminster / Kensington and Chelsea	Major	NT2
64	North Greenwich	Greenwich	District (future potential major)	NT1
65	Dagenham Heathway	Barking and Dagenham	District	NT4
66	Chadwell Heath	Barking and Dagenham / Redbridge	District	NT4
67	Green Lane	Barking and Dagenham / Redbridge	District	NT4
68	Brent Street	Barnet	District	NT4
69	Chipping Barnet	Barnet	District	NT3
70	East Finchley	Barnet	District	NT4
71	Finchley Central	Barnet	District	NT3
72	Golders Green	Barnet	District	NT4
73	Hendon	Barnet	District	NT4
74	Mill Hill	Barnet	District	NT4

Ref	Town centre	LPA	Town centre classification*	Night-time economy classification^
75	New Barnet	Barnet	District	NT4
76	North Finchley	Barnet	District	NT3
77	Temple Fortune	Barnet	District	NT4
78	Whetstone	Barnet	District	NT4
79	Colindale/ The Hyde	Barnet / Brent	District	NT4
80	Cricklewood	Barnet / Brent / Camden	District	NT4
81	Burnt Oak	Barnet / Brent / Harrow	District	NT4
82	Crayford	Bexley	District	NT4
83	Erith	Bexley	District	NT4
84	Lower Belvedere	Bexley	District	NT4
85	Sidcup	Bexley	District	NT4
86	Welling	Bexley	District	NT4
87	Church End (Brent)	Brent	District	NT4
88	Ealing Road	Brent	District	NT4
89	Harlesden	Brent	District	NT4
90	Neasden	Brent	District	NT4
91	Preston Road	Brent	District	NT4
92	Wembley Park	Brent	District	NT2
93	Willesden Green	Brent	District	NT4
94	Kingsbury	Brent / Harrow	District	NT4
95	Beckenham	Bromley	District	NT3
96	Penge	Bromley	District	NT4
97	Petts Wood	Bromley	District	NT4
98	West Wickham	Bromley	District	NT4
99	Hampstead	Camden	District	NT3
100	Kentish Town	Camden	District	NT3
101	West Hampstead	Camden	District	NT3
102	Addiscombe	Croydon	District	NT4
103	Coulsdon	Croydon	District	NT4
104	New Addington	Croydon	District	NT4
105	Norbury	Croydon	District	NT4
106	Purley	Croydon	District	NT4
107	Selsdon	Croydon	District	NT4
108	South Norwood	Croydon	District	NT4
109	Thornton Heath	Croydon	District	NT4
110	Upper Norwood/ Crystal Palace	Croydon / Lambeth / Bromley	District	NT3
111	Greenford	Ealing	District	NT4
112	Hanwell	Ealing	District	NT4
113	Angel Edmonton	Enfield	District	NT4
114	Palmers Green	Enfield	District	NT4
115	Southgate	Enfield	District	NT4
116	East Greenwich	Greenwich	District	NT4
117	Plumstead	Greenwich	District	NT4

Ref	Town centre	LPA	Town centre classification*	Night-time economy classification^
118	Thamesmead	Greenwich	District	NT4
119	Stamford Hill	Hackney	District	NT4
120	Stoke Newington	Hackney	District	**NT3**
121	Crouch End	Haringey	District	**NT3**
122	Muswell Hill	Haringey	District	**NT3**
123	North Tottenham	Haringey	District	NT4
124	Seven Sisters/West Green Road	Haringey	District	NT4
125	Tottenham Hale	Haringey	District	NT4
126	Tottenham High Road/Bruce Grove	Haringey	District	NT4
127	North Harrow	Harrow	District	NT4
128	Pinner	Harrow	District	NT4
129	Rayners Lane	Harrow	District	NT4
130	South Harrow	Harrow	District	NT4
131	Stanmore	Harrow	District	NT4
132	Wealdstone	Harrow	District	NT4
133	Kenton	Harrow / Brent	District	NT4
134	Collier Row	Havering	District	NT4
135	Elm Park	Havering	District	NT4
136	Harold Hill	Havering	District	NT4
137	Hornchurch	Havering	District	**NT3**
138	Rainham	Havering	District	NT4
139	Upminster	Havering	District	NT4
140	Eastcote	Hillingdon	District	NT4
141	Hayes	Hillingdon	District	NT4
142	Northwood	Hillingdon	District	NT4
143	Ruislip	Hillingdon	District	NT4
144	Yiewsley/ West Drayton	Hillingdon	District	NT4
145	Brentford	Hounslow	District	NT4
146	Feltham High Street	Hounslow	District	NT4
147	Archway	Islington	District	**NT3**
148	Brompton Cross	Kensington and Chelsea	District	NT4
149	Earls Court Road	Kensington and Chelsea	District	**NT3**
150	Fulham Road	Kensington and Chelsea	District	NT4
151	King's Road (west)	Kensington and Chelsea	District	**NT3**
152	Notting Hill Gate	Kensington and Chelsea	District	**NT3**
153	Portobello	Kensington and Chelsea	District	**NT3**
154	South Kensington	Kensington and Chelsea	District	**NT1**
155	Surbiton	Kingston	District	NT4
156	Tolworth	Kingston	District	NT4
157	Clapham High Street	Lambeth	District	**NT2**
158	Stockwell	Lambeth	District	NT4
159	West Norwood/ Tulse Hill	Lambeth	District	NT4

Ref	Town centre	LPA	Town centre classification*	Night-time economy classification^
160	Herne Hill	Lambeth / Southwark	District	NT4
161	Lavender Hill/ Queenstown Road	Lambeth / Wandsworth	District	NT4
162	Deptford	Lewisham	District	**NT3**
163	Downham	Lewisham	District	NT4
164	Forest Hill	Lewisham	District	NT4
165	New Cross	Lewisham	District	**NT3**
166	Sydenham	Lewisham	District	NT4
167	Blackheath	Lewisham / Greenwich	District	**NT3**
168	Lee Green	Lewisham / Greenwich	District	NT4
169	Mitcham	Merton	District	NT4
170	Morden	Merton	District	NT4
171	Canning Town	Newham	District	NT4
172	East Beckton	Newham	District	NT4
173	Forest Gate	Newham	District	NT4
174	Barkingside	Redbridge	District	NT4
175	Gants Hill	Redbridge	District	**NT3**
176	South Woodford	Redbridge	District	**NT3**
177	Wanstead	Redbridge	District	NT4
178	East Sheen	Richmond	District	NT4
179	Teddington	Richmond	District	**NT3**
180	Whitton	Richmond	District	NT4
181	Lordship Lane/East Dulwich	Southwark	District	NT4
182	Old Kent Road North	Southwark	District	**NT3**
183	Old Kent Road South	Southwark	District	**NT3**
184	Camberwell	Southwark / Lambeth	District	**NT3**
185	Carshalton	Sutton	District	NT4
186	Cheam	Sutton	District	NT4
187	Hackbridge	Sutton	District	NT4
188	North Cheam	Sutton	District	NT4
189	Rosehill	Sutton	District	NT4
190	Wallington	Sutton	District	NT4
191	Worcester Park	Sutton	District	NT4
192	Bethnal Green	Tower Hamlets	District	**NT3**
193	Brick Lane	Tower Hamlets	District	**NT2**
194	Chrisp Street	Tower Hamlets	District	NT4
195	Crossharbour	Tower Hamlets	District	--
196	Roman Road (east)	Tower Hamlets	District	NT4
197	Roman Road (west)	Tower Hamlets	District	NT4
198	Watney Market	Tower Hamlets	District	**NT3**
199	Whitechapel	Tower Hamlets	District	**NT3**
200	Bakers Arms	Waltham Forest	District	NT4
201	Highams Park	Waltham Forest	District	NT4
202	Leyton	Waltham Forest	District	NT4

Ref	Town centre	LPA	Town centre classification*	Night-time economy classification^
203	North Chingford	Waltham Forest	District	NT4
204	South Chingford	Waltham Forest	District	NT4
205	Wood Street	Waltham Forest	District	NT4
206	Balham	Wandsworth	District	**NT3**
207	Earlsfield	Wandsworth	District	NT4
208	Edgware Road/Church Street	Westminster	District	**NT3**
209	Harrow Road	Westminster	District	NT4
210	St John's Wood	Westminster	District	NT4

Table B2 London town centre network - future potential strategic town centres

Ref	Location	LPA	Status (2026)	Future potential classification*	Night-time economy classification^
211	Brent Cross	Barnet	Regional Shopping Centre	Metropolitan	**NT3**
212	Old Oak	OPDC	Emerging town centre	Major	NT4
213	Beckton Riverside	Newham	Out of centre shopping park	District/Major	NT4
214	Barking Riverside	Barking and Dagenham	Emerging town centre	District	NT4
215	Three Mills Lane	Tower Hamlets	Out of centre shopping	District	--
216	Hackney Wick	Hackney / Tower Hamlets	Neighbourhood centre	District	**NT3**

*** Town centre classifications**

International	Globally recognised centres for business, culture, experience and tourism functions with significant amounts of the highest-order comparison goods retail and leisure floorspace and unparalleled levels of public transport connectivity.
Metropolitan	Very large town centres with significant employment, culture, retail, leisure and service functions and excellent public transport access, serving wide catchments that often extend across over several boroughs and into parts of the wider South East. Typically, they have a higher proportion of high-order comparison goods retail relative to convenience retail.
Major	Town centres with significant employment, culture, leisure and service functions (though tending to be smaller in scale compared to metropolitan town centres). They typically have a relatively high proportion of comparison retail relative to convenience retail and excellent levels of public transport access.
District	Town centres of smaller scale compared to metropolitan and major town centres and often providing a higher proportion of convenience goods retail and services, alongside employment, cultural and leisure uses. Typically, they serve parts of a borough catchment area and are accessible by public transport, walking and cycling.

Local and neighbourhood centres (not identified in Table B1)	Typically serve a localised catchment mostly for convenience goods and other local services and should be accessible by walking and cycling. They often comprise local parades, small clusters of shops or high streets not located in strategic town centres. They may include a small supermarket (typically up to around 500 sqm) and other local services such as sub-post offices, pharmacies and laundrettes for example.

^ Night-time economy classifications

NT1	Centres of international or national significance
NT2	Centres of regional or sub-regional significance
NT3	Centres with more than local significance
NT4	Centres with local significance

Annex C Green Belt sustainable locations

BLG locations and numbers can be seen mapped on the key diagram in chapter 2.

Table C1 Well-connected train stations within Green Belt residential BLGs (as shown in Figure 6.4)

Station category abbreviations:
LU – London Underground station
NR – National Rail station (including Thameslink)
LOG – London Overground station
T – Tramlink station
EL – Elizabeth line station

BLG No.	Name of station	Category	BLG name	Easting	Northing
49	South Croydon	NR	Croydon-New Addington	532837	164371
49	East Croydon	NR	Croydon-New Addington	532853	165702
49	Lebanon Road	T	Croydon-New Addington	533419	165754
49	Sandilands	T	Croydon-New Addington	533888	165738
49	Lloyd Park	T	Croydon-New Addington	533715	164538
49	Coombe Lane	T	Croydon-New Addington	535161	164088
49	Gravel Hill	T	Croydon-New Addington	536375	163538
49	Addington Village	T	Croydon-New Addington	537057	163744
49	Fieldway	T	Croydon-New Addington	537683	163172
49	King Henry's Drive	T	Croydon-New Addington	537972	162563
49	New Addington	T	Croydon-New Addington	538177	162260
49	Addiscombe	T	Croydon-New Addington	534189	166294
50	Barkingside	LU	Eastern Hainault Loop	544788	189510
50	Fairlop	LU	Eastern Hainault Loop	544924	190615
50	Hainault	LU	Eastern Hainault Loop	545050	191514
50	Newbury Park	LU	Eastern Hainault Loop	544947	188378
51	Hillingdon	LU	East of Ickenham	507567	185015
51	Ickenham	LU	East of Ickenham	508095	185946
51	Northolt	LU	East of Ickenham	513228	184519

51	Ruislip Gardens	LU	East of Ickenham	510246	185837
51	South Ruislip	LU	East of Ickenham	511114	185403
51	Uxbridge	LU	East of Ickenham	505628	184171
52	Mill Hill Broadway	NR	Mill Hill & Barnet	521308	191942
52	Finchley Central	LU	Mill Hill & Barnet	525285	190680
52	High Barnet	LU	Mill Hill & Barnet	524989	196194
52	Mill Hill East	LU	Mill Hill & Barnet	524057	191460
52	Totteridge & Whetstone	LU	Mill Hill & Barnet	526117	193953
52	West Finchley	LU	Mill Hill & Barnet	525537	191633
52	Woodside Park	LU	Mill Hill & Barnet	525725	192564
53	Hatch End	LOG	Northwood	513054	191323
53	Headstone Lane	LOG	Northwood	513869	190584
53	Northwood	LU	Northwood	509236	191441
53	Northwood Hills	LU	Northwood	510270	190277
53	Pinner	LU	Northwood	512254	189471
54	Crews Hill	NR	Crews Hill & Chase Park	530946	200134
54	Hadley Wood	NR	Crews Hill & Chase Park	526227	198188
54	Gordon Hill	NR	Crews Hill & Chase Park	531893	197751
54	Cockfosters	LU	Crews Hill & Chase Park	528108	196393
54	Oakwood	LU	Crews Hill & Chase Park	529349	195968
55	Upminster	LU/NR	Upminster	556190	186848
55	Upminster Bridge	LU	Upminster	555080	186806
56	Gidea Park	EL	Harold Park	552958	189328
56	Harold Wood	EL	Harold Park	554888	190653
57	Ruislip	LU	West Ruislip	509498	187029
57	West Ruislip	LU	West Ruislip	508364	186791
58	Dagenham Dock	NR	Dagenham	548942	182987
58	Dagenham East	LU	Dagenham	550284	185033
58	Dagenham Heathway	LU	Dagenham	549031	184719
58	Elm Park	LU	Dagenham	552574	185734
58	Hornchurch	LU	Dagenham	553935	186243

Table C2 – Industrial Green Belt BLG reference table – (to help meet additional need for storage and distribution)

BLG no.	Green Belt industrial BLG reference name	Borough	BLG type
60	A13 (Rainham area)	LB Havering	Green Belt industrial
61	A12 (Romford area)	LB Havering	Green Belt industrial
62	A127 (Upminster area)	LB Havering	Green Belt industrial

63	M1 (Borehamwood West area)	LB Barnet / LB Harrow	Green Belt industrial
64	M20 (Swanley area)	LB Bexley / LB Bromley	Green Belt industrial
65	M40 (Northolt area)	LB Ealing / LB Hillingdon	Green Belt industrial
66	M4 (Heathrow area)	LB Hillingdon / LB Hounslow	Green Belt industrial
67	M25/A10 (Northern Lea Valley area)	LB Enfield	Green Belt industrial
68	M25 south (South Chessington area)	LB Kingston upon Thames	Green Belt industrial / Future mixed-use Green Belt candidate
76	M25 north (Potters Bar area)	LB Enfield	Future industrial Green Belt candidate
77	A1 (Borehamwood East area)	LB Barnet	Future industrial-led Green Belt candidate

Table C3 - Junctions with sections of the Strategic Road Network best placed to accommodate industrial growth within the Green Belt BLGs

Note – Many junctions include multiple turn-offs, such as roundabouts. For the purposes of this table, locations for such junctions are summarised to reduce table length.

BLG No.	Road Label	Road No.	Road type	Junction type	Junction No.	Easting	Northing
60	Marsh Way	A1306	A Road	Roundabout		550568	182429
60	A13	A13	A Road	Slip road		554779	180300
60	New Road	A1306	A Road	Dual carriageway		554675	180587
60	Choats Manor Way	A13	A Road	Dual carriageway		550177	182473
60	M25	M25	Motorway	Dual carriageway	M25 J30	557118	179860
60	M25	M25	Motorway	Dual carriageway	M25 J30	557536	180488
60	M25	M25	Motorway	Dual carriageway	M25 J30	557520	179284
60	A13	A13	A Road	Dual carriageway		555258	180081
61	Eastern Avenue East	A12	A Road	Dual carriageway		551229	190419
61	A12	A12	A Road	Roundabout		556683	192396
61	Colchester Road	A12	A Road	Dual carriageway		556406	192151
61	A12	A12	A Road	Roundabout		553346	190531
61	M25	M25	Motorway	Dual carriageway	M25 J28	557075	191957
61	M25	M25	Motorway	Dual carriageway	M25 J28	556379	192937
62	Southend Arterial Road	A127	A Road	Roundabout		558428	188331

62	M25	M25	Motorway	Dual carriageway	M25 J29	558649	188004
62	M25	M25	Motorway	Dual carriageway	M25 J29	558239	188994
63	M1	M1	Motorway	Dual carriageway		520329	193868
63	Edgware Way (Watford by-pass)	A41	A Road	Dual carriageway		520865	192871
63	M1	M1	Motorway	Slip road		520002	194253
63	A1	A1	A Road	Roundabout		520818	195235
63	M1	M1	Motorway	Slip road		517702	194141
63	M1	M1	Motorway	Dual carriageway		519833	194556
63	M1	M1	Motorway	Dual carriageway	M1 J4	517325	194439
64	Sidcup by-pass	A20	A Road	Dual carriageway		546623	170506
64	Sidcup by-pass	A20	A Road	Slip road		547013	170381
64	M25	M25	Motorway	Dual carriageway	M25 J3	553474	168980
64	M25	M25	Motorway	Dual carriageway	M25 J3	552425	167004
64	M25	M25	Motorway	Dual carriageway	M25 J3	552363	167888
64	A20	A20	A Road	Dual carriageway		550481	168252
65	Western Avenue	A40	A Road	Slip road		512614	183871
65	Western Avenue	A40	A Road	Dual carriageway		512142	184151
65	Ruislip Road	A312	A Road	Roundabout		511737	183162
65	Western Avenue	A40	A Road	Slip road		511054	184503
65	Western Avenue	A40	A Road	Dual carriageway		512920	183747
65	Western Avenue	A40	A Road	Slip road		510657	184434
65	Western Avenue	A40	A Road	Dual carriageway		511466	184438
66	Bath Road	A4	A Road	Roundabout		510914	176600
66	The Parkway	A312	A Road	Roundabout		510538	178913
66	M4	M4	Motorway	Slip road		510420	178288
66	The Parkway	A312	A Road	Dual carriageway		510607	179234
66	M4	M4	Motorway	Dual carriageway		511576	177850
66	Great South-West Road	A30	A Road	Dual carriageway		509695	175370

66	The Parkway	A312	A Road	Dual carriageway		510663	177318
66	The Parkway	A312	A Road	Slip road		510836	175992
66	M4	M4	Motorway	Dual Carriageway		512414	177809
66	Great South-West Road	A30	A Road	Dual carriageway		509694	175370
66	Bath Road	A4	A Road	Dual carriageway		511488	176404
66	M4	M4	Motorway	Dual carriageway	M4 J3	510885	178140
66	M4	M4	Motorway	Dual carriageway	M4 J3	510002	178267
67	Great Cambridge Road	A10	A Road	Dual carriageway		534851	199766
67	Great Cambridge Road	A10	A Road	Roundabout		535009	200015
67	M25	M25	Motorway	Dual carriageway	M25 J25	534379	199996
67	M25	M25	Motorway	Dual carriageway	M25 J25	535414	200047
68	A3	A3	A Road	Dual carriageway		514496	162424
68	M25	M25	Motorway	Dual carriageway	M25 J9	516594	158420
68	M25	M25	Motorway	Dual carriageway	M25 J9	516990	157751
68	M25	M25	Motorway	Dual carriageway	M25 J9	517295	157158
68	M25	M25	Motorway	Dual carriageway	M25 J9	516003	158705
68	A3	A3	A Road	Dual carriageway		513744	162223
76	M25	M25	Motorway	Dual carriageway	M25 J24	527038	200371
76	M25	M25	Motorway	Dual carriageway	M25 J24	526150	199979
77	Barnet by-pass	A1	A Road	Dual carriageway		521181	196600

Annex D Transport interventions

Table D1 Major transport interventions

Scheme	Status	Timescales
Devolution of Great Northern Inners services to Moorgate	Committed	2030
Docklands Light Railway extension to Thamesmead (and Thamesmead bus transit)	Committed	Early 2030s
HS2 delivery in London	Committed	2036-2043
Upgrades and/or rolling stock replacement of rail/tram lines including Bakerloo, Central, Piccadilly, Northern, Jubilee lines	Nearer-term funding priorities	2030-2050
Major rail station upgrades including at Waterloo, Stratford, Liverpool Street, Victoria and Euston	Nearer-term funding priorities	2030-2050
Bakerloo line extension to Lewisham / Hayes	Nearer-term funding priorities	2040+
Infrastructure upgrades to allow higher frequency services ('Metroisation') to: - South east London from Victoria, Cannon Street and Charing Cross - South central London from London Bridge via Peckham Rye and from Blackfriars to the Wimbledon Loop	Nearer-term funding priorities	2035-45
West London Orbital	Nearer-term funding priorities	2035+
Rail and tram extensions and/or new stations/stops to serve new-town scale development	Linked to specific development proposals	2030-2050
International rail expansion, including at Stratford International	Nearer-term opportunity	2030+
Infrastructure to allow higher frequency services and 'Metroisation' on other national rail lines	Longer-term aspiration	2045+
West Anglia Main Line 4-tracking	Pre-cursor to Crossrail 2	2040+
Crossrail 2	Statutory safeguarding to protect long-term interests	2050+
Surface access improvements to mitigate Heathrow expansion including: • Additional capacity on Elizabeth and Piccadilly lines • Southern and western rail access • Bus and Healthy Streets interventions on key corridors to/from/around Heathrow	Required if Heathrow expansion proceeds	2030s

Table D2 Other transport interventions

Intervention	To be identified by	Evidence for identification	Relationship with development
Walk network and public realm enhancements on the TfL Road Network	TfL	Strategic Walking Analysis and other TfL analysis	Possible financial contribution and land

Intervention	To be identified by	Evidence for identification	Relationship with development
			provision via setbacks
Other walk network enhancements, including: • Accessibility improvements, such as dropped kerbs, tactiles and even pavements • Wayfinding • Safe, convenient and prioritised crossings • Footway widening • Pedestrianised areas of town centres • Other Healthy Streets measures as outlined in Policy MBUL9 Healthy Streets and public realm	Boroughs	Strategic Walking Analysis and local borough analysis	Possible financial contribution and land provision via setbacks
New areas of public realm	Boroughs and developers	Typically development-led and site allocations	Possible financial contribution and land provision via setbacks
Strategic cycle routes	TfL and boroughs (to be mapped in transport evidence)	Strategic Cycling Analysis	Possible financial contributions, land via setbacks and routes through large development sites
Primary and secondary local cycle routes, combining physically segregated routes, low-traffic and traffic-filtered routes and safe cycle crossings over busy roads	Boroughs (to be mapped in transport evidence)	Local cycling analysis building on the Strategic Cycling Analysis	Possible financial contributions, land via setbacks and routes through large development sites
Destination cycle parking in town centres and other locations	Boroughs	TfL analysis	Possible financial contributions and land provison
Strategic public transport connections through priority bus corridors for high quality services	TfL and boroughs (mapped in transport evidence)	TfL connectivity analysis and the Sustainable Access Measure	Possible financial contributions, land via setbacks and routes through large development sites
Other bus priority measures	TfL and boroughs	Strategic Bus Analysis	Possible financial contributions, land via setbacks and routes through large development sites
Station upgrades and step-free access	TfL and Network Rail	TfL modelling	Possible financial contribution, potential role in delivery and land provision
New stations	TfL, Network Rail and boroughs	Sustainable Access Measure and assessment	Possible financial contribution and land provision

Intervention	To be identified by	Evidence for identification	Relationship with development
		of development opportunities	
New interchange facilities at existing stations, including those linked to Metroisation.	TfL, Network Rail and boroughs	Sustainable Access Measure and assessment of development opportunities	Possible financial contribution and land provision
Rail depot capacity, including the need for expansion to support larger fleets	TfL and Network Rail	TfL and Network Rail operational requirements	Possible financial contribution, potential role in delivery and land provision
Other national rail upgrades including Croydon Area Remodelling Scheme and Brighton Mainline upgrade	Network Rail	Network Rail investment priorities	Possible financial contribution and land provision
Bus service and infrastructure improvements and expansion (including garages, stands, stations, driver facilities, bus stops, build-outs, level boards and shelters)	TfL and boroughs	TfL operational requirements	Possible financial contribution and land provision
New passenger piers and river services	TfL and boroughs	Sustainable Access Measure and TfL operational requirements	Possible financial contribution and land provision
Controlled and residents' parking zones	Boroughs (to be mapped in transport evidence)	Housing projections and borough assessments of existing parking stress	Financial contributions for creation or enlargement of existing zones and conditions for permit-free development to manage impacts of new housing and ensure parking standards are met
Measures to manage traffic and demand for car parking	Boroughs	TfL strategic modelling and trip attraction analysis	Managing traffic impacts of growing city
Measures to manage the use and allocation of kerbside space	Boroughs	TfL strategic modelling, analysis and street space framework	Managing traffic impacts of growing city
Infrastructure to support the strategic freight network (such as hubs and EV charging facilities)	TfL and boroughs	TfL analysis	Managing traffic impacts of growing city
Rail and water freight infrastructure (such as intermodal facilities, nodal yards, railheads, wharves and piers)	TfL, Network Rail, Port of London and boroughs	TfL and Network Rail modelling and operational requirements	Managing traffic impacts of growing city

Annex E Brownfield First Opportunity Areas strategic growth visions

Bexley Riverside

Indicative homes: 4,500*
Indicative jobs: 1,500 (LESD 2024)
OA status: Nascent

Bexley Riverside contains one of the capital's largest concentrations of industrial land, a significant river frontage with safeguarded wharves, and the longest publicly accessible pier in London at Erith. The riverside setting and cultural assets offer a strong foundation for leisure and recreation, which are an important driver of economic growth and placemaking in this location. Growth should be guided by employment-led regeneration, with a focus on intensifying industrial land, and unlocking strategic sites for long-term productivity. This should leverage the waterfront to create vibrant destinations and be facilitated by improvements to connectivity.

A planning framework should reassess the OA boundary in collaboration with the Mayor and set out ambitions for creating high-quality industrial space that can support the growth of existing businesses and provide modern, fit-for-purpose, industrial floorspace. Managing the interface between residential and industrial uses should be a core design and policy consideration.

Sustainable residential-led growth should be concentrated around Lower Belvedere, Erith and Crayford town centres, where higher densities and mixed-use development can also support town centre renewal. Proposals around stations and centres should create a strong sense of arrival through public realm design and reinforce local identity. Heritage assets in Erith and Belvedere should be better connected to the marshes and riverside, with new development enhancing views, settings, and access across fragmented infrastructure.

Future development should improve walkability between centres, enhance cycle routes between Belvedere and Erith, and activate the riverside through public realm investment and better access to Erith Pier. There is also scope to promote the River Thames further as a cultural and recreational asset.

Brent Cross/ Cricklewood/ Staples Corner

Indicative homes: 11,000
Indicative jobs: 17,100 (LESD 2024)
OA status: Underway
Key transport investment required: West London Orbital

The OA offers a major opportunity for integrated growth across Barnet and Brent. Brent Cross Town is well placed to become a major urban cluster of more than 10,000 homes alongside jobs and cultural uses. The opening of Brent Cross West station, and its role as a future anchor for the West London Orbital, strengthens connectivity and unlocks wider regeneration across west and north London. Development-ready sites, including Brent Cross North and the Staples Corner Growth Area, should be brought forward comprehensively to reflect local priorities around health, wellbeing, connectivity and community-led placemaking.

Development at Brent Cross North is still at an early stage and requires a new masterplan. This process should test some of the principles set out in the previous consent, such as the reliance on larger-scale car-focused infrastructure. The proposed land use mix and delivery strategy will also be revisited. The framework should promote the integration between the northern and southern areas, the ambition to establish a new metropolitan centre, and the requirement for comprehensive development.

The expansion of the OA into the Staples Corner Growth Area enables the reimagination of historical industrial land as part of a mixed-use, climate-resilient neighbourhood. This transformation can retain and intensify employment uses where appropriate, supporting a diverse economic base that includes logistics, light industry, creative production, and emerging green technologies. Industrial land may be reconfigured to enable other uses, including residential in suitable locations. A clear spatial hierarchy and careful transitions between uses, will be essential.

Development should prioritise strengthening north–south and east–west connections between Brent Cross West and Staples Corner, addressing the severance created by road and railway. Improved connectivity should enhance access to green and blue assets, including the Welsh Harp, Clitterhouse Playing Fields, Brent Reservoir, Gladstone Park and Hendon Park. Improving the capacity, location and funding of connections that favour active travel over car use, will be essential on both sides of the A5 corridor. Tall buildings may be appropriate in select locations, particularly around Brent Cross West Station and parts of Brent Cross Town, and the gateways to Brent Cross North. Marker buildings could help define edges near the railway. Mid-rise, high-density typologies should be prioritised to deliver family housing, active frontages, and walkable neighbourhoods. especially where new development meets existing suburban fabric.

Canada Water

Indicative homes: 5,000
Indicative jobs: 38,800 (LESD 2024)
OA status: Underway

Once part of the Surrey Docks, the OAhas evolved into a thriving town centre, with regeneration landmarks such as the Boardwalk Bridge reflecting its transition from docklands to a distinctive waterside destination.

The area benefits from excellent transport connectivity, alongside a wide range of sports, leisure and riverside amenities. The ongoing transformation presents significant further opportunities to deliver new homes, strengthen town centre functions, activate the public realm, and enhance accessibility and use of the River Thames. Growth should be supported through both strategic brownfield redevelopment and infill and intensification on smaller sites.

Green and blue infrastructure should be central to the spatial strategy, meaning development should enhance access to green spaces, including dock water, and deliver high-quality, climate-resilient environments.

The OA can be positioned as a hub for innovation and enterprise, supporting specialist clusters in the CAZ, start-ups and small creative businesses in sectors such as technology and life sciences. There is potential for culture and leisure, retail, art, education, and health services.

Higher density development should be prioritised, with tall buildings focused on transport nodes and civic anchors

Growth should be supported by transport improvements, including Surrey Quays station upgrade and Lower Road cycle enhancements, with meanwhile uses to activate sites and maintain vitality during the town centre's ongoing transformation.

Charlton Riverside

Indicative homes: 8,000
Indicative jobs: 2,800 (LESD 2024)
OA status: Ready to grow

Charlton Riverside is a site of production and employment within the Thames Estuary Production Corridor, accounting for over nine percent of jobs in Greenwich. Its industrial heritage defines the area's character and role. Future development should retain and strengthen this employment function, safeguarding SIL while delivering strategies that integrate a mix of employment types with homes and outdoor amenities. New and adapted workspaces can accommodate a broad spectrum of businesses, from logistics and light industry to creative, cultural, and emerging sectors.

Alongside modern and affordable workspaces, Charlton Riverside will deliver 8,000 new homes. Growth should be supported by improved public transport connectivity, including a new riverside bus route and enhanced walking and cycling infrastructure, strengthening connections between new and existing communities.

To avoid piecemeal development and unlock a critical mass of growth, land assembly is needed. Sites under public ownership should be identified for early delivery, acting as catalysts for a diverse, inclusive, and economically resilient mixed-use neighbourhood.

The de-designation of Riverside Wharf could be explored if its capacity can be appropriately re provided elsewhere within the same wharf region. This could increase development capacity and enable a continuous link between the proposed linear park and the riverfront.

Much of the OA lies within Flood Zone 3 and has limited open space. Development should embed green infrastructure to support flood resilience, ecological connectivity and access to nature. Charlton Riverside should also be integrated with the wider south bank, complementing regeneration at Deptford/Greenwich, Greenwich Peninsula and Woolwich through improved walking and cycling links, particularly along the Thames Path, delivering an activated, accessible waterfront, and a more permeable, legible and people friendly street network.

City Fringe/ Tech City

Indicative homes: 11,000
Indicative jobs: 75,300 (LESD 2024)
OA status: Maturing

The OA is entering a new phase of growth, with major housing schemes such as Bishopsgate Goods Yard and London Dock. Future development should build on this by intensifying residential uses in key growth nodes, while balancing housing and employment, heritage assets, and public realm.

The OA boundary needs to be reviewed to exclude parts of CAZ where growth can be driven by CAZ policies.

The OA is home to a strategic economic cluster; Whitechapel Med City, anchored by Queen Mary University and the Royal London Hospital which is a globally recognised centre for life sciences.

Creative and fashion sectors concentrated in Whitechapel, Poplar, and Hackney should be supported through affordable workspace, cultural infrastructure, and alignment with the Thames Estuary Production Corridor. Development should also recognise and respond to the OA's vibrant night-time economy, particularly in Hoxton and Dalston.

Places such as Hoxton, Dalston, and the Kingsland Corridor can accommodate new homes, employment space, retail space, leisure, community, arts and cultural facilities to meet the needs of existing and new communities.

Recent transport upgrades, including the Elizabeth Line, Overground, and Old Street roundabout, have significantly enhanced connectivity. Development should further strengthen east–west linkages, reinforce and sustain very high levels of active travel, and deliver social infrastructure through place-based strategies such as Connecting Hoxton.

Croydon

Indicative homes: 12,000
Indicative jobs: 21,400 (LESD 2024)
OA status: Underway

Croydon is a Metropolitan Town Centre and a key employment hub outside the CAZ, benefitting from excellent transport connectivity, including two national rail stations, tram services, and Superloop routes. With a strong development pipeline, the Croydon Growth Zone designation supports delivery of critical infrastructure. However, progress on strategic sites has stalled due to complexity and viability challenges. The North End Quarter, including the Westfield Whitgift Centre, remains a pivotal catalyst for housing delivery and wider regeneration and should be unlocked to realise Croydon's full potential.

Development should be coordinated around rail upgrades and targeted investment in infrastructure (currently the Town Centre Regeneration Programme), with a focus on delivering high-quality public realm and green infrastructure, improvements to bus and tram services to support growth and active travel.

Croydon should be positioned as a hub for creative industries and innovation, with development enhancing existing spaces and enabling new clusters of activity. Flexible workspaces, cultural venues, and enterprise support should be embedded into the town centre fabric alongside the services, retail and leisure to strengthen local economies and attract emerging sectors.

Future development should celebrate Croydon's rich heritage and cultural identity, using it as a foundation for placemaking and town centre renewal without precluding tall buildings. Public realm, architecture, and programming should reflect the area's distinct character and foster civic pride.

Deptford Creek/ Greenwich Peninsula

Indicative homes: 6,000
Indicative jobs: 2,700 (LESD 2024)
OA status: Underway

Deptford Creek/Greenwich Riverside is one of London's oldest OA's with a history of steady development. Sites such as 1 Creekside, former Tidemill School, Crossfield Park and Sun Wharf are contributing positively to the continued transformation of Deptford Creekside and site allocations in Lewisham's North Area together with a healthy supply of committed developments, will be instrumental in delivering the OA objectives and creating balanced, mixed communities.

Convoys Wharf is the largest site in the OA and has planning consent for a mix of residential, employment and town centre uses, though delivery remains stalled. Direct engagement with developers and landowners to develop a delivery strategy could help unlock the site.

There is a strong cultural and employment presence near Deptford Creekside, including institutions such as Goldsmiths, University of London, Trinity Laban Centre and the Albany Theatre. There is also a growing number of workspaces and studios contributing to an established Cultural Quarter and the Lewisham North Creative Enterprise Zone, including key anchors such as Cockpit Arts and The Artworks Creekside.

Growth and regeneration should build on its maritime and industrial heritage and strong relationship with the Thames. This should be supported by the consolidation and intensification of employment sites to enable diversification and mixed-use development and major public realm improvements. Enhanced walking and cycling networks, including the Thames Path, Deptford Creek Waterway Link and Lewisham Links, alongside improved sustainable movement on the A2 and stronger east–west connections across Creekside, are essential.

Earl's Court / West Kensington

Indicative homes: 6,500
Indicative jobs: 18,200 (LESD 2024)
OA status: Ready to grow

The Earl's Court Development Company is leading a major regeneration programme to deliver a new mixed-use neighbourhood, with ambitions to create high-quality green spaces, commercial floorspace, and affordable workspaces that support economic growth, alongside new homes.

Future development should build on Earl's Court's strong identity, distinctive townscape, and rich heritage assets. Regeneration offers an opportunity to reinterpret the legacy of the former Exhibition Centre and re-establish Earl's Court as a cultural destination in central London.

Public transport connectivity should be further enhanced through station upgrades to West Brompton and West Kensington, and investment in active travel infrastructure, improved streetscapes, and high-quality public realm. Development should maximise opportunities for new east–west and north–south connections, improving access to neighbouring local and district centres.

Elephant and Castle

Indicative homes: 5,000
Indicative jobs: 13,900 (LESD 2024)
OA status: Maturing

Key transport investment required: Bakerloo Line Upgrade and Extension

Elephant and Castle is a key growth node on the edge of the CAZ benefitting from strong transport. The completion of a new station entrance and ticket hall at Elephant and Castle Underground station supports continued growth and lays the groundwork for the Bakerloo Line Upgrade and Extension. The proposed Bakerloo line upgrade and extension, which will strengthen links to the south. Development in the OA should anticipate and respond to this future connectivity.

The OA is anchored by two major developments: Elephant Park and the new town centre. Elephant Park has delivered nearly 3,000 new homes alongside a new park, setting a benchmark for mixed-use, high-density regeneration. The town centre redevelopment, is transforming the former shopping centre and the London College of Printing and Graphic Art campus into a mixed-use district with new homes, workspace, and civic infrastructure, including new retail and leisure floorspace.

Future regeneration should continue to deliver a cohesive network of interconnected open spaces, supported by new routes and improved permeability. This includes creating active links through the railway arches to enhance access to Elephant Park for later development phases and surrounding neighbourhoods. Regeneration should also build on the area's established cultural and community assets, recognising the significant Latin American community and the need for a diverse retail and community offer.

While the OA can accommodate high-density development and tall buildings, proposals should respond sensitively to the lower-rise western context, with opportunities for contextual mansion blocks that reflect the historic urban grain and allow a gradual transition in scale. Development should also strengthen the area's cultural identity and support a vibrant evening economy.

Great West Corridor

Indicative homes: 7,500
Indicative jobs: 26,100 (LESD 2024)
Key transport investment required: West London Orbital
OA status: Ready to grow

This OA is focused on the area to the north of Brentford along the Great West Road and A4/M4 corridor (known as the Golden Mile) and it sits within a key freight and movement corridor which connects Heathrow and the CAZ. Developments in the OA include the Great West Quarter and Brentford GTech Community Stadium.

Home to 45 per cent of London's broadcast media jobs, there are ambitions to grow the Golden Mile into a world leading Creative Technology Innovation District and to be a great place to live and work. The OA should focus on accommodating housing growth, industrial intensification and creating space for employment and innovation in creative, knowledge and research-based sectors. Development should incorporate an appropriate level of shared workspaces and small business units to contribute to Hounslow's aim to optimise land create new jobs.

Key public transport proposals including the West London Orbital and Southall-Brentford Rail Link offer major connectivity enhancements for the OA, creating vital connections with key interchanges at Old Oak Common Lane and with other west London town centres.
Improved blue and green infrastructures such as canal side access, interface with the West London Regional Park, and enhancements along the Golden Mile can help unlock sites and better link communities. Developments should aim to establish stronger east–west links, clean

air, walking and cycling routes running parallel and perpendicular to the M4/A4, and promote active and sustainable travel.

Greenwich Peninsula

Indicative homes: 21,000
Indicative jobs: 7,400 (LESD 2024)
OA status: Underway

Greenwich Peninsula is undergoing major transformation, guided by a masterplan that envisions a community of 35,000 people with new homes, workplaces, schools, and open spaces. Future development should accelerate housing delivery, particularly affordable homes, and embed strategies that enhance public realm.

Development should strengthen east–west connectivity across the Peninsula, linking the Design District and River Thames to Charlton Riverside and east Greenwich. The Peninsula Square presents a key placemaking opportunity to improve the sense of arrival to the OA. Transport connectivity has been enhanced by improved bus services, enabled by the Silvertown Tunnel. There will be further opportunities to improve connectivity and user experience through future redesign of the North Greenwich bus station. Development should leverage these upgrades to embed mode shift and enable higher-density typologies.

The OA will continue to grow as a cultural and leisure destination. It will deliver more than 7,000 new jobs reinforcing the role of the Design District and supporting the protection, modernisation and intensification of industrial land. Creative and cultural industries will be strengthened through dedicated space and ongoing investment in meanwhile uses to activate places and sustain a diverse economic ecosystem.

Harrow and Wealdstone

Indicative homes: 6,500
Indicative jobs: 2,300 (LESD 2024)
OA status: Maturing
Key transport investment required: Bakerloo Line Upgrade and Extension

Harrow and Wealdstone has significant potential for urban renewal, housing delivery, and town centre revitalisation. The OA is maturing, with capacity for over 6,000 new homes across key sites including Poet's Corner, the Civic Centre, Harrow Leisure Centre, and Harrow-on-the-Hill Underground and bus stations.

The BLE will enhance connectivity to central London, support higher-density development, and unlock new commercial floorspace. Development should respond by clustering growth around transport nodes and enabling mixed-use intensification.

Remaining pockets of industrial land adjacent to town centres should be reimagined through modern, flexible employment typologies. Meanwhile uses, such as Art Park, on Greenhill Way Car Park are encouraged to provide affordable enterprise space and diversify town-centre activity. These areas offer scope to create cohesive transitions between residential, commercial, and industrial uses, reinforcing Harrow's evolving mixed-use character.

Given the area's diverse demographic profile, including young families, older residents, and multi-cultural communities, development should deliver inclusive, intergenerational public spaces and social infrastructure.

Improving the public realm is essential, including through enhanced pedestrian and cycling routes between Station Road and Harrow & Wealdstone station. These connections should be safe, legible, and animated by active frontages.

The new Harrow masterplan presents a timely opportunity to align future growth with the regeneration of Wealdstone, strengthen Harrow Town Centre's civic and economic role, and embed spatial priorities that support sustainable development.

Hayes

Indicative homes: 2,500
Indicative jobs: 2,400 (LESD 2024)
OA status: Underway

Located within Hillingdon's Hayes Creative Corridor, the OA presents a convergence of strategic assets wiht the arrival of the Elizabeth line, Hayes' industrial heritage, and its setting along the Grand Union Canal. These elements position Hayes to deliver transformational change.

Early development schemes have demonstrated the catalytic potential of large, single-ownership sites. Future phases should prioritise the coordinated delivery of social infrastructure alongside new homes, ensuring active frontages, and a vibrant, walkable and cyclable town centre.

The High Street should be strengthened as Hayes' civic and cultural heart through better access to amenities, enhanced green infrastructure and improved connections to surrounding neighbourhoods. Proposals should improve wayfinding and address level changes around Hayes & Harlington station, with active public realm and commercial uses around the station helping to boost footfall and reinforce links to the High Street. Meanwhile uses on vacant sites and units should be supported to encourage local enterprise, creativity and inclusive placemaking.

Unlocking the potential of the Grand Union Canal as a destination for leisure, ecology, and movement will further enrich the area's identity and appeal. Development should open up frontages facing the canalside and support delivery of play spaces and sports facilities.

Industrial land within the OA should be optimised through higher-density formats, such as stacked light-industrial typologies, enabling employment growth while maintaining land efficiency. Given electricity capacity constraints in west London, early engagement with distribution and transmission network operators will be essential.

Hayes should build on its existing assets to deliver a diverse mix of community, civic, residential, and leisure functions. The emerging town centre and public realm strategy, alongside the new Local Plan and Growth Plan, presents a timely opportunity to define the OA boundary and embed spatial priorities.

Ilford

Indicative homes: 6,000
Indicative jobs: 1,200 (LESD 2024)
OA status: Ready to grow

Positioned as a key node on the River Roding Way, linking the Thames to Epping Forest, the OA benefits from enhanced connectivity via the Elizabeth line and an extensive bus network. While structural and market challenges remain there is a clear opportunity for coordinated action to unlock Ilford's potential.

A comprehensive framework led by the Mayor, Redbridge Council, and local stakeholders is being developed to optimise site capacity across the OA. Early phases of development can focus on mid-rise, high-density typologies that are viable and deliverable, helping unlock more complex, higher-density sites over time. Improving the Ilford gyratory at the western end of the High Road is key to enabling sustainable development. The Ilford Western Gateway project offers a strategic opportunity to reconfigure movement and introduce new homes and public spaces. The Town Hall and the cultural quarter represent another opportunity to improve the public realm and deliver high-quality mixed-use development.

Future development should reflect Ilford's young, diverse population and strengthen local character. Green infrastructure can enhance connectivity and climate resilience, while public realm improvements should prioritise wayfinding, inclusivity and safety. Ilford's cultural richness and entrepreneurial energy offer a foundation for inclusive growth and dedicated spaces for youth, arts, and enterprise, building on assets such as Ilford Lane and the wider high street, can help activate the town centre and support local employment. Public realm improvements are essential to drive growth and support new homes and employment spaces.

With River Roding flowing on the edge of the town centre, there is opportunity to improve access to blue and green infrastructure. Future development should enhance connections to the riverfront, unlocking its potential as a publicly accessible space for recreation, wellbeing, and biodiversity.

Isle of Dogs and South Poplar

Indicative homes: 28,000
Indicative jobs: 80,800 (LESD 2024)
OA status: Maturing

One of London's most active growth zones, with the mix of development evolving to accommodate other CAZ uses and housing in this hyperconnected location supported by excellent public transport.

Despite the OA including the global economic centre and sitting at the epicentre of a wider growth area across east to southeast London, physical infrastructure such as Aspen Way and the DLR tracks create significant severance. This results in a lack of cohesion between the deprived communities in South Poplar and Canary Wharf.

Along with the Local Plan, planning frameworks such as the 2019 OAPF and the 2021 South Poplar Masterplan SPD, recognise this challenge and provide a clear plan for growth in the OA. They aim for the benefits of growth such as affordable housing, employment, training opportunities and improved public spaces to be shared more equitably.

As some of Canary Wharf's earliest developments approach 40 years in age, retrofitting and repurposing existing buildings should be prioritised with redevelopment where necessary. The area is transitioning from a predominantly commercial district to a more balanced urban mix supported by important place-making. Key sites such as Billingsgate Market and Westferry should be positioned as anchors for high-quality, mixed-use development.

Emerging interest in life sciences and higher education in the area presents an opportunity to complement and diversify the local economy. Development should support this by enabling flexible workspace and research facilities within a walkable urban environment.

Kensal Canalside

Indicative homes: 3,500
Indicative jobs: 1,000 (LESD 2024)
OA status: Nascent

Kensal Canalside is the largest brownfield site within the Royal Borough of Kensington and Chelsea, and one of the last remaining major brownfield sites in central London. By 2050, Kensal Canalside OA will have been transformed from a former gasworks and railway depot into a thriving, well-connected community with a minimum of 3,500 new homes and 2,000 new jobs with an emphasis on and accommodating employment for the creative sector.
The delivery of a new north-south walking and cycling bridge across the Great Western Railway and a pedestrian bridge over the canal are fundamental to the success of the site. Land remediation is a challenge, and the OA faces poor walking and cycling connectivity currently. New connections will knit the neighbourhood into the existing city fabric and link westwards to Scrubs Lane and Old Oak Park Royal. There is opportunity for a biodiversity-led development strategy for the area with phasing and meanwhile use being Crucial for effective delivery.

Lee Valley

Indicative homes: 34,500
Indicative jobs: 9,200 (LESD 2024)
OA status: Underway

The OA is shaped by its distinctive landscape of reservoirs, marshland and open space, and by its location on the UK Innovation Corridor. Realising its potential will require consolidating industrial land, accelerating housing delivery and improving connectivity. Growth should reinforce the OA's role as a hub for logistics, manufacturing, green industries, and leisure and ensure that economic benefits are shared by existing communities.

In north-east Enfield, development should focus on consolidating and intensifying industrial land at Brimsdown and Southbury to safeguard capacity for modern logistics and advanced manufacturing.
In south-east Enfield, Meridian Water will remain a flagship regeneration area and a primary focus for housing and employment growth. Development should deliver an innovation-led, mixed-use neighbourhood combining homes, high-quality public spaces and modern workspaces.

In north Tottenham, cultural and event-led regeneration will drive town centre renewal and inclusive growth, anchored by High Road West and Tottenham Hotspur Stadium and securing a legacy from major events such as Euro 2028. Tottenham Hale will be reinforced as an enterprise and innovation hub through mixed-use development, retail intensification and a transformed station arrival.

In Hackney, the Stamford Hill and Lea Bridge corridor will be intensified, delivering new homes, improved transport links, enhanced green infrastructure and stronger connections to the Lea Valley Regional Park.

In Waltham Forest, Walthamstow will be promoted for mixed-use growth, whilst at Blackhorse Lane and Lea Bridge, development should support industrial intensification alongside new housing.

Recent government investment offers a timely opportunity for coordinated place-based renewal and long-term resilience.
Reviewing the OA boundary could support integrated industrial land management and cohesive place-shaping across town centres, including Lea Bridge and the full Walthamstow Town Centre.

Improving east–west connectivity is a priority, alongside stronger north–south links and mitigation of barriers such as the A406. Key interventions include increased capacity on the West Anglia Main Line, upgrades to the A1055, and an integrated bus and active travel network connecting town centres, employment areas and the Lee Valley. Phased investment in the Walthamstow Central transport hub would help unlock long-term economic and social benefits.

Delivery will require a sub-regional approach, building on the Tri-Borough Partnership

London Riverside

Indicative homes: 38,000
Indicative jobs: 31,400 (LESD 2024)
OA status: Underway

London Riverside has the potential to deliver more than 38,000 new homes and 31,400 jobs by 2050. Located within the Thames Estuary Production Corridor and Thames Freeport, it spans key places such as Barking Town Centre, Barking Riverside, Dagenham Dock, Thames Road, Rainham Strategic Industrial Land, Beam Park and London Riverside Business Improvement District.

The Overground extension to Barking Riverside initially unlocked 10,800 new homes, with additional homes at greater densities now being planned. The OA should be supported by further transport improvements in the area such as Beam Park station and active travel corridors. There's also potential to transform the A1306 into a green corridor to better connect riverside communities to places such as Barking.

Economic growth could be underpinned by the intensification of employment and industrial land, which needs to be planned carefully and in tandem with the aspiration For housing ambitions. Dagenham Dock, Box Lane and Thames Road, CEME, London Sustainable Industries Park and Thames Freeport are key sites for industrial innovation, catering for growth sectors such as food and drink, sustainable construction, automobile and advanced manufacturing, logistics and e-commerce. Creative industries are also essential for growth, with the OA set within the Thames Estuary Production Corridor and southeast London becoming home to a growing film studio cluster.

Open space and ecological connectivity are central to realising the OA's vision. Enhancing access to Barking's parks and the River Roding, completing the Thames Path, and a new bridge for walking, cycling and buses between Barking Riverside and Beckton Riverside would knit together marshland, urban centres, and emerging neighbourhoods into a more inclusive and connected landscape. As a Healthy New Town, Barking Riverside offers a platform for embedding wellbeing and social infrastructure.

New Cross/ Lewisham/ Catford

Indicative homes: 15,000
Indicative jobs: 11700 (LESD 2024)
OA status: Underway
Key transport investment required: Bakerloo Line Upgrade and Extension (BLE)

The BLE is a major transport proposal to improve links between the New Cross, Lewisham and Catford Opportunity Area and north and southeast London. It is critical to unlocking the area's housing potential, with significant regeneration benefits around Lewisham and New Cross Gate stations. A proposed Phase 2 extension to Hayes and Beckenham Junction, has strong public support and could be delivered alongside or after Phase 1, offering substantial growth opportunities in the south of the borough and beyond.

Other transport interventions include a new overground station at Surrey Canal Road, enhancements to Lewisham station, transformation of the A21 corridor and the longer-term re-alignment of the South Circular (A205).

Development in New Cross/ Lewisham/ Catford OA is underway, with the successful Broadway Theatre in Catford town centre, nightlife of regional/sub-regional importance in Lewisham town centre, and Lewisham being elevated to a Metropolitan Town Centre. Future growth should be delivered through mixed-use development and the transformation of Lewisham and Catford town centres with a reinvigorated

retail, employment, civic, leisure and residential offer. This includes the delivery of a range of sites including New Bermondsey at Surrey Canal Triangle, Deptford Landings at Oxestalls Road, Lewisham Retail Park, Lewisham Shopping Centre; and four site allocations: Catford Shopping Centre, Catford Island, Laurence House/ Civic Centre and Wickes/ Halfords.

The Lewisham North Creative Enterprise Zone reflects existing clusters of creative and cultural industries and provides an opportunity for new high-quality workspace. Meanwhile, initiatives such as Room for the Rivers, A Place for People, the Greening Evelyn Toolkit and the Lewisham Links project will strengthen green and blue infrastructure, improve sustainable connectivity and enhance the quality of places across the OA.

Old Kent Road

Indicative homes: 21,000*
Indicative jobs: 13,800 (LESD 2024)
OA status: Underway
Key transport investment required: Bakerloo Line Upgrade and Extension
*Homes capacity which is dependent on the delivery of the BLE extension

Old Kent Road OA benefits from strong bus provision and strategic Underground and Thameslink connections, linking north to Luton Airport and Bedford and south to Gatwick Airport and Brighton. The proposed Bakerloo line upgrade and extension, including new stations at Burgess Park and Old Kent Road would significantly improve north–south connectivity. In the interim, the 'Bakerloop' express electric bus provides additional capacity along the route, connecting Waterloo, Elephant and Castle and Lewisham via the OA.

Development is underway with planning approvals for non-residential floorspace, student and co-living schemes alongside major residential schemes such as Malt Street, however, a

significant amount of further development is reliant on the BLE. The Old Kent Road Area Action Plan sets out ambitions for two new district centres and co-location of industrial workspace with new homes and other uses in LSIS and the Action Area Core. Higher density employment spaces should be accommodated in these new town centres, with lower employment density in the form of light industrial and industrial distribution accommodated towards the north, south and west OA boundary. Community partnerships such as Livesey Exchange are advancing locally-led models to secure affordable workspace, cultural activity, and community presence on the high street. A robust strategy for meanwhile uses, shaped around local needs, could sustain momentum while the BLE is delivered.

Investment in green infrastructure along the Old Kent Road corridor, improved access to green assets such as Burgess Park from Aylesbury Estate, and local connectivity and walking and cycling improvements across the area would be beneficial. Targeted bus, cycling and walking improvements to the southern section of the OA between St. James Road and Ilderton Road will come as phase one of the Old Kent Road Healthy Streets project, with further improvements to follow.

Old Oak/Park Royal

Indicative homes: 23,000
Indicative jobs: 19,900 (LESD 2024)
OA status: Maturing

Old Oak and Park Royal is one of the largest OAs in London and a nationally significant regeneration project. Spanning 655 hectares, its transformation is being driven by the Mayor of London's Old Oak and Park Royal Development Corporation (OPDC) in partnership with the three host boroughs, national government, TfL and HS2.

The OA combines London's largest industrial estate at Park Royal, and one of London's largest brownfield mixed-use regeneration sites at Old Oak, along with Wormwood Scrubs, a large-scale green open space.

The OA will be anchored by the new Old Oak Common station, connecting the area to Heathrow, central London and to major UK innovation hubs. Additional transport improvements are also planned in the area including a potential new station on the Mildmay and West London Orbital lines at Old Oak Common Lane, new bus infrastructure and active travel networks.

Old Oak will be established as a new town centre delivering a balanced mix of town centre, employment and community uses. Development should be planned and delivered comprehensively around Old Oak Common station to maximise its strategic transport role and support placemaking at scale.

OPDC will implement its Economic Vision in alignment with the Mayor's London Growth Plan by driving industrial innovation through WestTech London and supporting inclusive growth across west London.

Development should be supported by high-quality, infrastructure that enables growth and long-term sustainability. This includes new parks, bridges and public realm, improved highways, and an integrated walking and cycling network, alongside enhanced education, health and community facilities.

Olympic Legacy

Indicative homes: 30,000
Indicative jobs: 29,300 (LESD 2024)
OA status: Maturing

The OA spans Hackney, Newham, Tower Hamlets, and Waltham Forest and sits within the Elizabeth Line East Growth Corridor and the UK Innovation Corridor. Formerly part of the Lower Lea Valley OA, it delivers one of London's highest housing outputs, with strong affordable provision and a robust residential pipeline.

Stratford and the Queen Elizabeth Olympic Park (QEOP) should continue to anchor the OA's innovation and cultural economy, with the East Bank cluster (BBC, Sadler's Wells, UAL, UCL, V&A) and emerging sectors in esports, creative industries at Here East positioned for further expansion. Hackney Wick is also an area with high redevelopment potential, especially for creative industries, light industrial-to-residential conversion, and employment space.

Development should safeguard and modernise industrial capacity, with Bow Goods Yard reimagined as a strategic freight and logistics hub.
Transport infrastructure is strong, but connectivity gaps remain. Investment should prioritise improved access to QEOP, Pudding Mill, Lea Bridge and Leyton. Waterden Green, shaped by input from teenage girls and unlocked by East Wick and Sweetwater, offers a replicable model for community-led placemaking.

Stratford station and Town Centre offer significant growth potential, with housing, social infrastructure and greening all high priorities including. Placemaking should include areas such as Leyton Mills through coordinated mixed-use intensification and public realm improvements.

As the London Legacy Development Corporation's role reduces, a boundary review is needed. Lea Bridge should be incorporated into the Lee Valley OA to align with its industrial and transport role, while the Olympic Legacy boundary should be realigned to reflect the Leytonstone Strategic Location given the potential for housing and town centre growth.

Poplar Riverside

Indicative homes: 11,000
Indicative jobs: 2,900 (LESD 2024)
OA status: Nascent

Poplar Riverside, spanning Tower Hamlets and Newham, is set for major transformation over the next two decades. The shift from industrial to residential uses, alongside estate regeneration at Teviot and Aberfeldy can support the delivery of new homes, employment, enterprise and leisure.

To unlock its full potential, development should overcome the physical barriers posed by road corridors, the River Lea and surrounding infrastructure. Strategic investment in bridges, active travel routes, and public transport connections is essential to link communities with key hubs such as Canning Town, West Ham and the wider DLR network. There is also potential to stitch together the east to west corridor linking two district centres.

The river's edge should be reimagined as a civic and ecological asset. Development should respond to its industrial heritage while maximising opportunities for biodiversity, flood

resilience, and public access. A continuous, high-quality riverside route should connect fragmented sites and support everyday movement.

Poplar Riverside should evolve from an isolated enclave into a legible, connected urban district. This requires a coordinated approach to permeability, with green and safe routes that stitch together neighbourhoods.

While retaining elements of its industrial character, development should introduce flexible employment typologies and mixed-use formats that support local enterprise and economic resilience.
The OA boundary should be defined in local plans with coordinated delivery across boroughs.

Royal Docks and Beckton Riverside

Indicative homes: 26,500
Indicative jobs: 11,400 (LESD 2024)
OA status: Underway
Key transport investment required: DLR to Beckton Riverside and Thamesmead

The OA is London's only Enterprise Zone and one of Europe's largest regeneration areas. The planning framework in place provides a strategic foundation for growth, setting out principles to unlock new housing while reinforcing the area's role as a major economic hub anchored by London City Airport, Tate & Lyle, and ExCeL London.

Housing delivery has progressed in areas such as Canning Town and Pontoon Dock, while Beckton Riverside remains largely undeveloped. Unlocking this eastern edge will require coordinated infrastructure investment, particularly the proposed DLR extension to Thamesmead. In addition to the delivery of the planned Thames Wharf DLR station, additional station capacity at existing DLR stations may also be needed.

The OA comprises six distinct neighbourhoods, each with tailored growth potential. In Canning Town and Custom House, development should consolidate recent progress by prioritising estate regeneration, new public spaces, and community infrastructure. Royal Victoria and West Silvertown contain waterside sites such as Thameside West, Limmo, and Knights Road, which offer scope for mixed-use intensification and public realm activation. In Silvertown, future development should improve access to the water and build on the area's industrial legacy through adaptive reuse and placemaking. Royal Albert Dock and Albert Island can be positioned as a future innovation quarter. In North Woolwich, growth should strengthen cultural and social infrastructure while addressing severance and improving connectivity to surrounding areas. To the east, Beckton Riverside presents an opportunity to activate the river frontage, improve access through new transport links and bridge connections to Barking Riverside, and a major new green space that complements high-density living.

Southall

Indicative homes: 15,000
Indicative jobs: 900 (LESD 2024)
OA status: Ready to grow

The OA is located between Heathrow and London's central economic zone, and is within West Tech London and this has influenced major infrastructure investment. The Mayor's London Growth Plan identifies Ealing as a borough primed for major growth and investment, supported

by its proximity to two strategic investment zones: Old Oak and Park Royal and West Tech London, a globally significant cluster for life sciences, business and technological innovation.

There is a healthy residential pipeline including large-scale residential-led mixed-use development schemes such as Green Quarter and along Merrick Road. With a signficiatn proportion of the population in Southall of South Asian or Asian British background, it is essential to retain and preserve Southall's heritage and cultural assets as it develops, including places of worship.

The opening of the Elizabeth line, has contributed to increased residential development, a greater presence of young professionals and better access to jobs and education, both in central London and further out to places such as Reading. The thriving retail offer in Southall Town Centre should be supported through enabling community-led approaches to regeneration and to generate more local jobs and attract more footfall.

Southall's SIL at Great Western Road and LSIS provide opportunities for intensification. The emerging two hyperscale data centres could drive the replacement of significant industrial land with digital infrastructure and companies, and provide new economic opportunities for the local community as well as opportunities for heat networks.

There are a series of active travel routes, local connections and public realm improvements underway through the Get Southall Moving programme. Development in the area should take advantage of opportunities to enhance green connections and create a network that brings together the Grand Union Canal, Minet County Park, South Road and connect with the wider network of routes across Brent River valley as part West London Regional Park.

Thamesmead and Abbey Wood

Indicative homes: 21,000
Indicative jobs: 5,700 (LESD 2024)
OA status: Nascent
Key transport investment required: DLR to Beckton Riverside and Thamesmead

The OA offers significant potential for infrastructure-led growth, anchored by its natural assets and diverse communities. One of the major development sites in the OA is Thamesmead Waterfront, shortlisted as a potential New Town.

While the arrival of the Elizabeth line at Abbey Wood station has unlocked parts of the OA, much of the area remains undeveloped and dependent on the proposed DLR extension from Beckton Riverside to Thamesmead. The local planning framework, sets out a coordinated strategy to deliver new homes and jobs, contingent on the DLR.

The OA is home to a diverse and youthful community, with more than half of residents identifying as Black, Asian, mixed race or another ethnic minority. Future development should be rooted in the area's cultural and ecological assets, while driving economic growth. This includes nurturing the creative sector alongside strengthened industrial, logistics and other employment uses.

Regeneration should reconnect fragmented settlements and town centres with water, wildlife, and nature. Improving walking and cycling conditions along major roads such as Yarnton Way and Central Way and the proposed bus transit linking the OA to Woolwich, Abbey Wood and potentially Belvedere, is essential for sustainable travel and unlocking development.

Vauxhall, Nine Elms, Battersea (VNEB)

Indicative homes: 9,500
Indicative jobs: 25,100 (LESD 2024)
OA status: Maturing

The OA is on the fringe of the CAZ with major housing developments and the Battersea Power Station Masterplan at the core of its growth. The Northern line extension has enhanced connectivity and enabled delivery of new homes and jobs. The OA has also delivered a range of place-making infrastructure, including the Nine Elms Linear Park. The Vauxhall Cross Gyratory scheme – will improve connectivity, safety and the public realm and transform Vauxhall station environment as the gateway to the OA, and recent improvements have been completed at the northern and southern Lambeth Bridge roundabouts.

Lambeth and Wandsworth support growth in the OA and site allocations will be vital in improving permeability in the OA. A significant volume of new council housing is now also emerging as part of the Battersea Power Station development through an ambitious public-private partnership.

The Low Line comprises 299 railway arches spanning the area from Lambeth Road through to the heart of Vauxhall, Nine Elms, and Battersea. Physical interventions are being prioritised to transform the railway viaduct from a barrier to playing a role in cultural, community and active travel.

CAZ Class E/ experience economy clusters are designated within the OA, supported by Electric Boulevard as a new high street and a planned town centre at Battersea Power Station. Together these form a major retail, leisure and cultural destination for London. VNEB plays a key role as an employment and community services hub for Wandsworth, with growing clusters in food, digital and creative industries, including the emerging Battersea Design and Technology Quarter. This is anchored by organisations such as Apple, Penguin Random House and the Royal College of Art. Development should strengthen the clusters, provide a diverse mix of commercial space, and deliver affordable workspace, particularly in areas such as the Embassy District.

Wembley

Indicative homes: 8,500
Indicative jobs: 100 (LESD 2024)
OA status: Maturing

Wembley is Brent's largest growth area and a nationally significant visitor destination. With most development now complete or underway, the focus should now be on stitching together fragmented sites, supporting industrial land typologies and interfaces and enhancing public realm.

The Wembley Park scheme delivered Union Park, the first major green space in the area in over 150 years. Future development should build on this momentum by expanding access to high-quality public realm and ensuring safe, legible walking and cycling routes that connect Wembley Park, Wembley Central, and surrounding neighbourhoods. Development should support high-

quality civic spaces and green corridors and activation through cultural programming and meanwhile uses.

As residential build-out continues and strategic industrial land remains active in the north-east, development should manage transitions between residential, commercial, and industrial uses with care and also explore opportunities for intensified typologies.

Wembley is identified in Brent's Tall Building Strategy as a zone for height and density, with clusters of buildings over 10 storeys already shaping its skyline. Future development should continue to deliver high-density formats that support active ground floors, generous public realm, and sustainable travel.
Active travel networks should be enhanced to complement good public transport connectivity.

White City

Indicative homes: 6,500
Indicative jobs: 16,800 (LESD 2024)
OA status: Underway

White City is becoming one of the UK's leading life-sciences hubs, with enhanced education and research developments, particularly in healthcare and bio-technology. For example, Stanhope PLC's reuse-led life sciences campus demonstrates strong green sector ambitions by significantly reducing embodied carbon. Meanwhile, White City Estate, and Wood Lane Estate are delivering new homes and jobs across the OA.

Future projects in the OA should facilitate opportunities for more residents to enter the workforce to reflect and support the existing diverse communities in the OA. Proposals should be mixed-use providing homes and jobs (particularly in the creative and academic sectors) but also community uses and small-scale retail.

Public spaces are connected in the OA through a network of green and active streets and the Superloop. Further improvements are needed such as connections from Uxbridge Road to the Old Oak/Park Royal OA. Active travel and green infrastructure should be deployed to improve local connections. For example, Wood Lane should be a key artery connecting White City to key open spaces such as Wormwood Scrubs and Shepherd's Bush Green. It will also be important to improve the physical relationship and permeability between the Innovation District, the Imperial College campus and Hammersmith Hospital/Linford Christie Stadium. Quick-wins could include public realm improvements that connect Shepherd's Bush Green and Uxbridge Road to address circulation and nighttime safety, and shopfront improvements along Uxbridge Road.

Wood Green

Indicative homes: 5,500
Indicative jobs: 5,300 (LESD 2024)
OA status: Ready to grow

Wood Green is the largest centre in Haringey and serves a multi-borough catchment. Fragmented land ownership, infrastructure constraints, and viability issues have stalled delivery and limited the town centre's ability to evolve into a fully thriving destination. Intervention is needed to unlock new homes and jobs, building on completed schemes and activating strategic sites.

Wood Green Central is a pivotal council-owned site with significant placemaking potential, encompassing Station Road and the Arriva bus garage at a key crossroads linking Alexandra Palace, Tottenham, the Civic Centre and the town centre. While the site could accommodate tall buildings and act as a gateway to the area, comprehensive delivery is constrained by the need to relocate the bus station.

Increased frequencies along the Great Northern line provide an opportunity to better connect to both central London and emerging growth areas such as the potential new town in Crews Hill, and key employment hubs beyond London. Additional opportunities include the Piccadilly line upgrade, step-free access at Wood Green station and improvement to the pedestrian bridge at Alexandra Palace station.

Wood Green should be positioned as a cultural and creative destination that supports a strong evening economy, extending activity from the Cultural Quarter into the town centre. Development should improve the quality and mix of community, social and sports infrastructure. Green infrastructure and public realm should be central to the spatial strategy, supported by the Council's Wood Green Central Public Realm Framework.

Annex F Public service infrastructure

Table F1 Projected public service infrastructure requirements

Public service infrastructure	Provider	Strategic London-wide need	Forecast base and end year	Floorspace requirements (sqm)
Health	NHS	Acute healthcare provision[118]	2027/28 to 2041/42	188,533.47
	NHS	Mental healthcare provision[119]	2027/28 to 2041/42	17,733.59
	NHS	Intermediate healthcare provision[120]	2027/28 to 2041/42	35,881.30
	NHS	Primary healthcare provision[121]	2027/28 to 2041/42	111,165.12
Emergency services	Metropolitan Police Service (MPS)	Office space, specialist facilities and public facing facilities	2027 - 46	85,598
Criminal justice uses	Ministry of Justice (MoJ)	Prison spaces	2025 - 50	Circa 86,000

Table F1 Projected public service infrastructure requirements considers the strategic approach to identifying cross-boundary public service infrastructure requirements across London and should be used by Plan-making authorities to help inform Local Plans.

Requirements for schools, nurseries, social care facilities and libraries are typically identified and provided at a borough level by local authorities, reflecting variations in local provision and demand. Local authorities should use the latest GLA housing-based population projections to help inform planning for these services.

Further detail on public service infrastructure requirements is set out below.

Health

The NHS London Healthy Urban Development Unit Model is a comprehensive tool to assess the health service requirements resulting from future population projections and forms the basis of the data in this table.

[118] Acute healthcare provision is comprised of planned hospitals stays from a waiting list, emergency admissions, and day surgery.
[119] Mental healthcare provision comprises secure in-patient beds for individuals with severe, acute mental health needs who cannot be supported in the community.
[120] Intermediate care refers to rehabilitation care designed to ease the transition between hospital and home and reduce unnecessary hospital admissions and the length of stay.
[121] Primary healthcare provision comprises GPs and primary care services

A key aspect of the NHS 10 Year Plan 'Fit for the Future' is to develop integrated neighbourhood-based services locally, designed around the specific needs of the local population. This model of care is based on providing extra resource in multidisciplinary neighbourhood teams, so people can easily see the best healthcare professional for their need or concern. Expanded multidisciplinary teams will comprise a range of staff in addition to GPs, including alongside other clinicians such as pharmacists, district nurses, community-based specialists and allied health professionals (such as physiotherapists and podiatrists/ chiropodists), joined by social care and the voluntary sector.

This new way of partnership working among GPs to coordinate primary care services for their population at the neighbourhood level is a significant shift away from past practice where GPs worked independently and offered limited services. This transformation in the way services are delivered means that people should be able to access the majority of their health and care needs closer to home. From an estate perspective, delivering the NHS 10 Year Plan means a shift away from smaller GP premises to larger scale, modernised Neighbourhood Health Centres that accommodate a wider range of healthcare services built around the needs of the local population.

Plan-making authorities should engage actively with their Integrated Care Board (ICB) to ensure they have an up-to-date understanding of local needs.

Criminal justice

The MoJ published the 10-year Prison Capacity Strategy in December 2024 which sets out the government's approach to ensuring there are the prison spaces needed to keep the public safe. This includes an ambition to secure new land in readiness for future prison builds.

The MoJ has advised that for every 100,000 people, there are approximately 144 prison places in use. This is an average based on the mid-year population estimates for England and Wales, and the total prison population reported in March each year between 2009 and 2024.

Applying the ratio of 0.001438 prison places per head of population to the GLA 2024-based demographic projections potentially generates the need for circa 1,900 prison places. Applying an average gross external floor area results in a need for approximately 86,000sqm.

It should be noted that prison population forecasting is complex and the ratio of prison places to general population varies according to government policy interventions such as early release.

Emergency services

The MPS estimates that it will require approximately 80,598 sqm of additional estate floorspace to accommodate an increase of around 4,242 policy officers, needed to support forecast population growth in London based on the GLA's 2024-based demographic projections.

This need includes space for neighbourhood policing offices; specialist facilities such as custody suites, laboratory facilities, kennels, armouries, stables etc; training facilities; and

facilities to support modern policing including digital infrastructure, fleet electrification, and new technologies.

Education

Local authorities have a statutory duty to ensure there is a sufficient number of school places for every child in the local area.

London local authorities plan and anticipate demand for school places locally, working with the DfE to predict pupil numbers based on a variety of factors including the GLA's population estimates, existing school roll data and provision, and local patterns of in/out migration of residents.

Early years provision
Local authorities have a statutory duty to ensure there are enough childcare places in their area for working parents.

Social care

Local authorities have a statutory duty to plan for social care facilities in their area.

Libraries

Local authorities have a statutory duty to provide comprehensive and efficient library services for all persons living, working, or studying in their area.

Annex G – Strategic Industrial Locations

Adopted Local Plans have resulted in, and emerging Local Plans will result in, changes to the boundaries of existing SILs. The introduction of non-industrial development in SILs and LSISs will be supported only, if set out in an adopted or emerging (Regulation 19) Local Plan at the time of publication of this draft Plan; and in agreement with the GLA as part of a coordinated masterplanning process in line with paragraph 4.19.

Table G1: Strategic Industrial Locations

Ref.	Broad 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	Newham/Tower Hamlets
4	Hackney Wick	Central Services Area	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	Thames Gateway	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 / A40 / Heathrow	Brent
15	Great West Road / Brentford – Transport Avenue	Park Royal / A40 / Heathrow	Hounslow

16	Great Western	Park Royal / A40 / Heathrow	Ealing
17	Hayes Industrial Area	Park Royal / A40 / Heathrow	Hillingdon
18	Honeypot Lane, Stanmore	Park Royal / A40 / Heathrow	Harrow
19	North Feltham Trading Estate	Park Royal / Heathrow	Hounslow
20	North Uxbridge Industrial Estate	Park Royal / A40 / Heathrow	Hillingdon
21	Northolt, Greenford, Perivale	Park Royal / A40 / Heathrow	Ealing
22	Park Royal	Park Royal / A40 / Heathrow	OPDC (Brent / Ealing / Hammersmith & Fulham)
23	Staples Corner	Park Royal / A40 / Heathrow	Brent
24	Stonefield Way / Victoria Road	Park Royal / A40 / Heathrow	Hillingdon
25	Uxbridge Industrial Estate	Park Royal / A/40 /Heathrow	Hillingdon
26	Wealdstone Industrial Area	Park Royal / A40 / Heathrow	Harrow
27	Wembley	Park Royal / A40 / Heathrow	Brent
28	Beckton Riverside	Thames Gateway	Newham
29	Belvedere Industrial Area	Thames Gateway	Bexley
30	Bromley Road	Thames Gateway	Lewisham
31	Charlton Riverside	Thames Gateway	Greenwich
32	Dagenham Dock / Rainham Employment Area	Thames Gateway	Barking & Dagenham / Havering
33	Erith Riverside	Thames Gateway	Bexley

34	Foots Cray Business Area	Thames Gateway	Bexley / Bromley
35	Greenwich Peninsula West	Thames Gateway	Greenwich
36	Hainault Industrial Estate	Thames Gateway	Redbridge
37	Harold Hill Industrial Estate	Thames Gateway	Havering
38	King George Close Estate, Romford	Thames Gateway	Havering
39	London Industrial Park	Thames Gateway	Newham
40	Rippleside	Thames Gateway	Barking & Dagenham
41	River Road Employment Area	Thames Gateway	Barking & Dagenham
42	Southend Road Business Area	Thames Gateway	Redbridge
43	St Mary Cray	Thames Gateway	Bromley
44	Thames Road, including Crayford Industrial Area	Thames Gateway	Bexley
45	Thameside East	Thames Gateway	Newham
46	Thameside West	Thames Gateway	Newham
47	West Thamesmead / Plumstead Industrial Area (including White Hart Triangle)	Thames Gateway	Greenwich
48	Barwell Business Park	Wandle Valley	Kingston
49	Chessington Industrial Estate	Wandle Valley	Kingston
50	Kimpton Industrial Area	Wandle Valley	Sutton
51	Marlpit Lane	Wandle Valley	Croydon
52	Morden Road Factory Estate and Prince George's Road	Wandle Valley	Merton
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
55	Willow Lane, Beddington and Hallowfield Way	Wandle Valley	Merton